



Building 881 Complex Environmental Compliance Issues Relating to Building Shutdown

The week of May 4, 1998 auditors from Proctor's Enterprise, at the request and direction of Kaiser-Hill, conducted a building walkdown and record review of the Building 881 complex. This audit was to determine what actions relating to environmental compliance need to be conducted prior to placing the building in shutdown. The Building 881 Complex is located at the east of RFETS. Building 881 is the largest building in the complex and is supported by buildings T881A, T881B, 881F, 881G, 881H, 830, 864, 885, and 887. Buildings 881, 885, 887, 881F, 881G, 881H, and 830 were included in this assessment.

Building 881 was originally constructed in 1953 and contains approximately 255,000 ft² of floor space. The structure was built into a hillside and is located mostly below grade.

The scope of this assessment was to determine what actions need to be taken in order to place this building into safe, compliant shutdown from an environmental compliance/safety perspective. It was not an environmental compliance assessment.

Attached is a table listing the issues that were identified during this assessment along with recommended actions. At the current time there is no written definition of what placing a building in shutdown means. Safe/compliant building shutdown needs to be definitively expressed to personnel associated with this project. It will not be possible to determine all actions that need to be taken until this status of the building during shutdown can be defined. Certain assumptions were made for this assessment including, building ventilation system will remain operational, inspections of the building will continue to take place and resources will be adequate to conduct necessary actions.

There are immediate actions required to ensure this facility is in compliance with regulatory requirements and Consent Orders. These actions can be divided into six categories:

- 1 Idle Equipment
- 2 Chemical Management
- 3 RCRA Tank System Management
- 4 Miscellaneous Waste Management
- 5 Containerized Waste Management
- 6 Inspection Log Sheets

1 Idle Equipment Management

Equipment that was until recently being used in conjunction with the activities in this building complex have now become idle and will need to be evaluated to determine future management requirements from a regulatory and safety perspective. Due to the large number of equipment that must be inventoried, characterized, and in most cases emptied this represents a significant effort, both in terms of personnel and waste management.

An evaluation must be conducted to determine any future uses for this equipment in accordance with the property re-utilization program. If there is no future use then the equipment will become idle and subject to the regulatory requirements of 6 CCR 1007-3, section 261 4(c). It appears that most of this equipment contains small amounts of liquids and oils that will need to be drained. Some of this equipment is expected to contain hazardous waste that will need to be emptied within 90-days or managed appropriately and removed after 180 days.

ADMIN RECORD

1

SW-A-003984

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Recommendation Conduct an inventory of equipment that will no longer be needed in this building. After the inventory is complete submit for property re-utilization review to determine if any of the equipment will/can be made available for reuse. Equipment, which has no future use, will become idle by regulatory definition. Any material remaining in the equipment must be characterized, including making a hazardous waste determination, and managed appropriately in compliance with the regulatory requirements to empty all pieces of equipment containing hazardous waste within 180 days of becoming idle (Note equipment, containing hazardous waste, that will not be drained within 90-days of becoming idle will have special management requirements until they are drained, no later than 180-days after being idled) Pieces of equipment that contain non-hazardous materials, oils etc should be drained as necessary to reduce liability from leaks, spills, and potential exposures

2. Chemical Management

The facility tenants have completed the chemical roundup in compliance with the Chemical Management Consent Order. There are still some lab pack containers, packed by Radian, that remain in the building which are scheduled to be removed by the end of May, 1998. Since this building has completed the chemical roundup any new waste chemicals identified will have to be managed in full compliance with the regulations. Also, all product chemicals must be barcoded and tracked in ICMS in accordance with RFETS procedures

Recommendation Ensure that all personnel are aware of the above requirements and conduct periodic spot checks throughout the buildings to ensure that all requirements are being met

3 RCRA Tank System Management

The tank system associated with Building 881 has a breach in the primary/secondary containment system and is temporarily out of service. According to the facility manager the current plan is to place the tanks, located in Building 887, in RCRA stable condition and request funding in FY 1999 to repair the system and place it back into use. If the system is not placed back into service it will have a significant impact on waste management. All liquid wastes generated from activities conducted in this building would have to be containerized and transferred to Building 374 for treatment. The clean up of the HF scrubber unit is anticipated to generate several thousands of gallons of wastewater

There is a portion of piping that is no longer in service that continues to accumulate small amounts of liquid from an unidentified source

Recommendations Determine if the tank system is needed. If so, then proceed with the repair activities and place back into service. If the system will be repaired in early FY99 there is no need to get the tanks to a RCRA stable condition. It will be necessary to inspect the tanks daily, however, if they contain inventory. It would not be necessary to inspect the ancillary piping daily since no waste is being introduced into the system. Based on past experience, inspect the piping as necessary (e.g., monthly), particularly the portion that has been collecting liquid from an unidentified source

4 Miscellaneous Waste Management

There were wastes identified throughout the building that will need to be properly managed. These wastes ranged from waste chemicals in laboratories to circuit boards, batteries, and light bulbs

Recommendations Conduct a verification walk down of Building 881 and its associated buildings and complete an inventory of all items that have the potential to become waste or pose a safety/health risk. This walkdown needs to include entering all areas, opening all cabinets and drawers to complete an inventory of all excessed items. The inventory should be submitted for review by the property re-utilization organization. Those items that have future use should be sent to the new user as soon as possible. Items that have no future use should be managed as

waste and will be subject to all regulatory requirements These requirements include conducting a hazardous waste determination/characterization, proper management (i e 90-day area, inspections), proper packaging and segregation, and disposition off-site

5. Containerized Waste Management

There are 671 containers listed in WEMS as residing in this building Problems were identified during the building walk through concerning inconsistencies between WEMS and information on the container i e waste identification (i e LLW instead of LLT for PCB wastes) containers identified in the building that were not listed in WEMS, containers with waste that WEMS identified as being empty and incorrect locations

There are 346 containers in Room 144 and its associated tunnel According to Dennis Mauser, RMRS, all 156 of the containers in the tunnel will need to be repacked and many of the remaining containers in Room 144 will also need repackaging There is a Permacon in room 144 which has never been used It is planned on being modified so it can be used for the necessary repackaging

Recommendations Conduct a 100% verification/reconciliation of the data in WEMS and information on the container, including Traveler information Correct any discrepancies This may require repackaging efforts for discrepancies that cannot be rectified based on process knowledge or other available information Develop a schedule to remove wastes from the building, factoring repackaging efforts in the Permacon

6. Inspection Log Sheets

The inspection log sheets for the tank system note that it is unknown if the waste in the tanks is compatible with the tanks, evidenced by the amount of small leaks, rust, etc Facility management stated that this response is being made by the Stationary Operating Engineers who inspect the tank system because they do not have control over what waste is placed into the tanks

The 90-day inspection log sheets for the 90-day area located in Room 296 noted no deficiencies, but, at the time of the walkdown several issues were identified including discrepancies between the number of containers in the unit and the number listed in WEMS and incompatible stored next to each other

Recommendations Ensure that the waste in the tanks is compatible with the tanks or close immediately Develop a log that will keep a running total of the amount and type of waste that is introduced into the system and ensure that all personnel conducting tank inspections have access to the log This effort should be minimal even when the tank system is put back into operation as the facility manager stated that only one drain would be allowed to discharge into the system

Ensure that all personnel who are conducting inspections are adequately trained and understand the importance of those inspections

List of Attachments

Document #	Title/Date
881-1	Environmental Issues, Buildings 881, 885, 887, May 12, 1998.
881-2	Letter from State of Colorado to the Department of Energy concerning Building 881 Footing Drain Discharge Water, October 7, 1998.
881-3	WEMS Report for Room 144, May 6, 1998.
881-4	Inspection Log Sheets for Building 887 Tank Systems, various dates.
881-5	Schematic of Building 881 Process Waste Collection Systems 1 and 2, May 31, 1990.
881-6	Asbestos Inventory, 1992.
881-7	Idle Equipment Inventory; Hazardous and Non-Hazardous, from Compliance Order on Consent, 97-08-21-01, September 12, 1997.
881-8	Photographs of Various Rooms/Areas within Building 881 Cluster

881-1

Environmental Issues – Buildings 881, 885, 887
Revision Date: 05/13/98

Regulatory Deficiency	Responsible Party	Issue	Discussion	Suggested Action(s)	Sources
Observation	K-H Team	Definition of shutdown	There is no definition of what it means to place this building into a shutdown mode. It is imperative that this term be well defined to ensure that all actions necessary to meet this interim state are conducted	Determine what will be the interim condition of this building prior to implementation of D & D activities Based on this definition develop a deactivation plan that will address actions necessary to ensure safe and compliant status of this building	Discussions with Don Clark, RMRS Henry Padron, RMRS, Dennis Mauser, RMRS, and Ken Fry, RMRS, on May 5, 1998
Observation	RMRS	Bldg /Ductwork Characterization	Floors in many areas are covered with metal flooring to cover contamination on the floor underneath. There has been limited characterization and inspection of the ductwork in the building	Ensure that areas of contamination are well documented. If these areas are disturbed prior precautions will need to be taken and any wastes generated managed appropriately	Building walk down conducted May 4 and 5, 1998. Bob Cathel, K-H, Cheryl Sayler, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alstatt, PE, and Dennis Mauser, RMRS
Observation	RMRS	Air Wash Units and Cooling Towers	It was not apparent whether biocides have or are being used to control algae	If the determination is made to shut these systems down they would need to be evaluated to determine if any hazardous biocides were used. Manage wastes generated from these systems accordingly	Building walk down conducted May 4 and 5, 1998. Bob Cathel, K-H, Cheryl Sayler, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alstatt, PE, and Dennis Mauser, RMRS

RCRA Tank System	RMRS	RCRA Tank System	<p>Determine if this portion of the process waste system is needed. If it is then proceed with the repair efforts. If not proceed with RCRA Stable activities</p> <p>Exhibits Photographs 50594-01 and 50594-10</p>	<p>Discussions with Don Clark, RMRS Henry Padron, RMRS, Dennis Mauser, RMRS, and Ken Fry, RMRS, on May 5, 1998</p>
Regulatory Deficiency Compliance Order on Consent 97-08-21-01, 1997 Tank Management Plan JKW-010-98	RMRS	Out of Service Portion of RCRA Tank System	<p>Determine the source of the liquid. This should be included in a phased approach. This tank system cannot be designated stable until all sources of liquid into the system are stopped</p>	<p>Discussions with Don Clark, RMRS Henry Padron, RMRS, Dennis Mauser, RMRS, and Ken Fry, RMRS, on May 5, 1998</p>
Regulatory Deficiency Compliance Order on Consent 97-08-21-01, 1997 Tank Management Plan JKW-010-98	RMRS	Tank Inspections	<p>Ensure that all drains to the tank systems are locked out of use. The system is currently not in service due to issues with the secondary containment and primary piping integrity. If the tank system is repaired and placed back into service there should be a central drain that is used and an inventory maintained of all wastes introduced into the system</p> <p>H Pardon is to institute an administrative requirement to document all wastes entered into the regulated tank system. Work orders have been submitted and implemented to correct identified deficiencies</p>	<p>Review of inspection log sheets for tanks associated with Building 881. Tanks are located in Building 887</p> <p>Conversation with Henry Padron, May 5, 1998</p> <p>Exhibits Copies of Inspection log sheets for weeks of 8/30/97, 7/21/97, 3/16/98, 4/6/98.</p>
Regulatory Deficiency RFETS RCRA Permit: Part IV - Tank Systems, B.4 Comp Of Tank Systems and Wastes	RMRS			

Chemical Management	RWRS	Waste chemicals	<p>During the building walk down several (approximately a dozen) chemicals were located that were not labeled and not identified. These are assumed to be unknowns. Some are in open containers. There was one container of liquid that was not labeled sitting on the counter that did not have secondary containment.</p> <p>At least one chemical was observed that was in a broken container with no lid and was not barcoded (bleach in Room 122).</p> <p>In verifying barcode numbers in ICMS it was determined that several chemicals/containers were incorrectly identified. Attached to this table is a list of specific instances.</p> <p>Some chemicals were observed that did not have barcodes.</p> <p>Several containers of labpacked chemicals were not segregated as to hazard class (i.e., corrosives on top of oxidizers, next to flammables). This issue is still under review to determine if there are any exemptions for labpacks. However, in any case best management practice would be to segregate containers holding incompatible wastes.</p>	<p>Conduct a complete building walk down and develop an inventory of all waste chemicals in the area. Determine if there are specific safety risks associated with any of these wastes. Characterize and manage in accordance with the Chemical Management Order on Consent and Chemical Management Plan.</p> <p>Immediately ensure that all containers are in good condition, barcoded and are segregated from incompatible wastes.</p> <p>Segregate containers of incompatible wastes.</p>	<p>Building walk down conducted May 4 and 5, 1998, Bob Cathel, K-H, Cheryl Saylor, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alstatt, PE, and Dennis Mauser, RMRS</p> <p>Review of ICMS, May 4, 5, and 6, 1998</p> <p>Exhibits Photograph 50591-08, 50592-06, and 50592-08</p>
Potential Regulatory Deficiency Compliance Order on Consent 97-08-21-02 Waste Chemical Plan	6 CCR 1007-3 § 285 177 (c)	Product Chemicals	<p>During the building walk down in Room 121, two product chemicals were observed being stored next to each other that were incompatible i.e. caustic and oxidizer/acid.</p> <p>A random check on barcode numbers identified several discrepancies, i.e. empty versus inventory, not listed in WEMS</p> <p>Several items were also observed in Room 144 that did not have barcodes (see attachment).</p> <p>Numerous secondary containers were not labeled as to their contents or hazards e.g. containers in Rooms 115C, 114B, 114D, 143B, and 264</p>	<p>Immediately segregate these incompatible by providing secondary containment for the liquid or moving</p> <p>Verify the ICMS system with containers in the building, correct as necessary</p> <p>Identify the contents on the containers and label appropriately</p>	<p>Building walk down conducted May 4 and 5, 1998, Bob Cathel, K-H, Cheryl Saylor, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alstatt, PE, and Dennis Mauser, RMRS</p>
Potential Regulatory Deficiency Should be following the Chemical Management Program Plan 29 CFR 1910.1200					

<p>Regulatory Deficiency Compliance Order on Consent 97-08-21-02 Waste Chemical Plan</p> <p>K-H</p> <p>Room 127A was excluded from the chemical management order due to difficulties in accessing the room. The access issue is related to rad concerns</p>	<p>There are chemicals in this room that will have to be characterized, stored and managed in accordance with the Compliance Order on Consent.</p>	<p>Gain access to this room, inventory the chemicals and managed appropriately</p> <p>Building walk down conducted May 4 and 5, 1998, Bob Cathie, K-H, Cheryl Sayler, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alstatt, PE, and Dennis Mauser, RMRS</p>
<p>Idle Equipment</p>	<p></p>	<p></p>
<p>Regulatory deficiency Compliance Order on Consent 97-08-21-01 Idle Equipment Management Plan</p> <p>RMRS</p> <p>HF Scrubber Unit</p>	<p>This unit is included in the Idle Equipment Order on Consent and deferred until D & D. However, under the consent order it is classified as a category 3 piece of idle equipment, which must be posted in accordance with the idle equipment management plan. There is no additional information to suggest that the status of this unit has changed</p> <p>In conversations with Dennis Mauser on May 4 and 5, 1998 he stated that a proposal has been submitted to include flushing and dismantling the unit. He stated that this activity would generate a significant amount of wastewater that would need to be managed. It would be possible to use the process waste system if it were operational. If not another management method would have to be developed</p>	<p>Post all entrances to the HF scrubber in accordance with the Idle Equipment Order on Consent and Management Plan</p> <p>If clean-up of this unit is implemented any wastes generated would need to be properly characterized and managed. Need to incorporate this action into the decision to repair the process waste system</p> <p>Until clean-up actions are implemented no actions are required</p>
<p>Regulatory deficiency Compliance Order on Consent 97-08-21-01 Idle Equipment Management Plan</p> <p>K-H</p> <p>Idle Equipment Contaminated with beryllium</p>	<p>There are numerous pieces of equipment that are located in areas that unless wasted will need to have Be swipes in addition to rad. Based on this, additional cost some of this equipment may become waste and may contain or be characterized as hazardous waste</p>	<p>Discussions with Don Clark, RMRS, Henry Padron, RMRS, Dennis Mauser, RMRS, and Ken Fry, RMRS, on May 5, 1998</p> <p>Determine what equipment is located in these areas in conjunction with the idle equipment inventory. Ensure that the requirement to test for Be is included in the decision making as to excess or waste Manage appropriately</p>

Regulatory deficiency Compliance Order on Consent 97-08- 21-01 Idle Equipment Management Plan	K-H RMRS	Idle Equipment	<p>There are thousands of pieces of equipment that will have to be inventoried, evaluated under the PU & D process and the hazardous waste regulations and properly dispositioned</p> <p>Some of the equipment still have liquids associated with them e.g. Room 282, 272, 127B, and 233 contain equipment with auxiliary containers which contain liquid that could readily be spilled. Room 127B contained a burret with what appear to be charcoal and water</p>	<p>Conduct inventory of all excess equipment and manage in accordance with the Idle Equipment Management Plan</p> <p>Drain and characterize all liquids associated with equipment</p> <p>Discussions with Don Clark, RMRS Henry Padron, RMRS, Dennis Mauser, RMRS, and Ken Fry, RMRS, on May 5, 1998</p> <p>Exhibits</p> <p>Photographs 50591-07, 50591-10, 50592-03, 50592-05, 50593-03, 50593-04, 50593-05, 50593-06, 50593-07 and 50594-07</p>	<p>Building walk down conducted May 4 and 5, 1998, Bob Cathel, K-H, Cheryl Saylor, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alstatt, PE, and Dennis Mauser, RMRS</p> <p>Exhibits</p> <p>Photographs 50591-07, 50591-10, 50592-03, 50592-05, 50593-03, 50593-04, 50593-05, 50593-06, 50593-07 and 50594-07</p>
LLW Waste Issues	K-H RMRS	LLW Issues	<p>According to Henry Padron there are several containers of oil/water waste located outside of Room 247 in the hallway. Disposition of these containers is unknown at this time as there is no priority for removal of straight rad waste.</p> <p>There are 671 containers listed in WEMS as residing in Room 144 with 156 of these located in the tunnel in this room. According to Dennis Mauser, RMRS, all of the containers in the tunnel will need to be repackaged and many of the remaining 346 may also require repackaging</p> <p>There is a permecon in this room, which has never been put into operation. Efforts are currently being made to modify this unit so that it can be used in the necessary repackaging efforts</p>	<p>These drums should be removed from the building prior to putting the building into a shutdown</p>	<p>Building walk down conducted May 4 and 5, 1998, Bob Cathel, K-H, Cheryl Saylor, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alstatt, PE, and Dennis Mauser, RMRS</p> <p>Exhibits</p> <p>Photograph 50593-01</p>
For Order?	K-H RMRS	WEMS Discrepancies for LLW		<p>When conducting the building walk down numerous discrepancies were identified between the information in WEMS and actual field conditions. These included, containers not in WEMS that contained waste, WEMS indicating the drum is empty when it had waste, location errors, and errors with waste descriptions. These waste description errors many pertained to containers of rad/TS CA waste.</p>	<p>Building walk down conducted May 4 and 5, 1998, Bob Cathel, K-H, Cheryl Saylor, Proctor's Enterprise (PE), Kim Myers, PE,</p>

Criteria Procedure		Which are detailed elsewhere Attached to this table is a list of specific instances of errors in WEMS	Catherine Alistatt, PE, and Dennis Mauser, RMRS Exhibits Photograph 50591-11
Observation	DCI	Waste in Laboratory Hoods	All materials should be removed from all hoods prior to building shut down
		DCI is currently conducting very limited lab operations in Building 881. There are plans to move these operations to Building 125 in the near future. During this assessment wastes were observed in the hoods in these DCI labs	Building walk down conducted May 4 and 5, 1998, Bob Cathel, K-H, Cheryl Sayler, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alistatt, PE, and Dennis Mauser, RMRS
		Hazardous Waste	
Regulatory Deficiency 6 CCR 1007-3 § 262 and 264 73	K-H RMRS	WEMS Discrepancies for RCRA Regulated Units	When conducting the building walk down numerous issues were identified between the information in WEMS and actual field conditions. These included containers not in WEMS that contained waste, and location errors. Attached to this table is a list of specific instances of errors in WEMS
			Conduct a 100% WEMS verification immediately of all RCRA regulated areas and make necessary changes in WEMS
			Building walk down conducted May 4 and 5, 1998, Bob Cathel, K-H, Cheryl Sayler, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alistatt, PE, and Dennis Mauser, RMRS Exhibits WEMS Report for Building 881 Photographs 50592-12, 50594-05, 50594-04 and 50594-06
Regulatory Deficiency RFET3 RCRA Permit: Part V - Treatment Units, C 6 a	K-H	Permitted Cyanide Treatment Unit	This unit is not in operation. However, it may be needed in conjunction with the chemical roundup so will not be closed until near the end of that program which is scheduled for September 1999. There is conflicting information as to the status of this unit. Some reports have indicated that there may be residual wastes in this unit that may be hazardous due to heavy metals. This has not been verified. If this unit still contains hazardous waste it must be inspected weekly as a storage unit.
Potential Regulatory	K-H	Misc wastes	There are many miscellaneous wastes still remaining in the building including circuit boards, lead bricks, batteries, light bulbs, etc. There
			Conduct a complete building walk down and develop an inventory of all wastes
			Building walk down conducted May 4 and

Deficiency	RMRS DCI		Characterize and manage appropriately including using the PU&D process	5/1998, Bob Cathel, K-H, Cheryl Sayler, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alstatt, PE, and Dennis Mauser, RMRS Exhibits Photograph 50583-05
Regulatory Deficiency	K-H RMRS 6 CCR 1007-3 § 262 34(b) and 263 15	Hazardous Waste Inspections	<p>A review of the inspection log sheets for the 90-day container storage areas and the permitted tanks in 887 revealed several issues. The weekly inspection log for the week of 4/30 in Room 286 indicates that all containers were under the 90-day time limit. In fact, the 90-day limit ended on 4/27/98. The log sheet did not indicate that there is a 30-day extension from CDPHE.</p> <p>The inspection log sheets for the 90-day area in Room 296 indicated no problems with the area and the inspection was conducted during this assessment. During this assessment issues identified with this unit included unlabeled waste, WEMS errors, and potential compatibility issues.</p>	<p>Ensure that the 90-day extension has been granted and provide documentation in the log book.</p> <p>Ensure that inspectors are adequately trained</p>
Precious Metals	RMRS		<p>The inspection log sheets for the tanks located in Building 887 are being marked as unknown in response to the question is the waste compatible with the tank. Harry Pardon stated that this is an administrative issue but it has been on-going for at least 7 months. A more detailed discussion is included under RCRA tanks</p>	<p>Ensure that this issue is resolved</p>
Potential Regulatory Deficiency	RMRS	There are precious metals being accumulated in this building	There are precious metals in this building that need to be evaluated to determine if they can be released. During interviews it was suggested that these precious metals are radioactively contaminated	Determine if these metals meet the regulatory requirements for precious metal recovery and manage accordingly
TSCA-PCBs				Conversations with Dennis Mauser, RMRS, May 4 and 5, 1998
Regulatory Deficiency	K-H 40 CFR §761 180	WEMS Discrepancies	During the building walk down at least one container that was located in the PCB storage area in Room 48A was not located in WEMS. This leads to an invalid inventory for these types of regulated wastes	Building walk down conducted May 4 and 5, 1998, Bob Cathel, K-H, Cheryl Sayler, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alstatt, PE, and Dennis Mauser, RMRS Exhibits WEMS Report for Building

	K-H	PCB Waste Management	There are PCB wastes being accumulated and stored in this building in room 248A. This room is adjacent to areas that do leak precipitation. The requirements of 40 CFR 761.65(b) could be violated if this area begins to leak	Continue inspections with an emphasis on the walls and ceiling. Ensure that the inspection frequency is adequate to detect deterioration in the walls and ceiling Ship waste from building as soon as possible	881 Photograph 50592-01
Regulatory Deficiency 40 CFR 761.65(b)	K-H	RMRS	Potential exists for ongoing leaks from PCB light ballasts	Develop a ballast management procedure. Incorporate periodic fixture visual inspections to identify/mitigate leaking units	Discussions with Don Clark, RMRS Henry Padron, RMRS, Dennis Mauser, RMRS, and Ken Fry, RMRS, on May 5, 1998 Exhibit: WEMS Report for Building 881 TSCA Area Inspection Log Sheets
Potential Regulatory Deficiency 40 CFR 761.65(b)	K-H	RMRS	PCB ballasts are known to exist in this building		Discussions with Don Clark, RMRS Henry Padron, RMRS, Dennis Mauser, RMRS, and Ken Fry, RMRS, on May 5, 1998
Potential Regulatory Deficiency 40 CFR 761.65(b)	K-H	RMRS	Paint is peeling throughout the building and is collected, sampled, and contained	Ensure that paint waste is characterized for possible PCBs and asbestos in addition to hazardous waste constituents	Determine if there are PCBs in the elevator oils
Potential Regulatory Deficiency 40 CFR 761.65(b)	K-H	RMRS	Lead paint is known to exist in the building. The presence of asbestos and PCBs in the paint has not been determined	It was not determined if there are PCBs in the oils associated with the elevators	Determine where the oil leak is originating and initiate repairs
Observation	K-H	RMRS	Hydraulic oil for Elevator	Transformers located in this building have been retrofitted and now contain mineral oil (Dennis Mauser, RMRS 5/5/98). However at least one is leaking	Discussions with Dennis Mauser, RMRS, May 4 and 5, 1998 Exhibit: Photograph 50593-10
TSCA-Ashbestos Observation	K-H	Asbestos contaminated	During the building walk down several containers that were labeled as containing asbestos waste were listed in WEMS as straight LLW and	When conducting the WEMS 100% verification ensure that all containers of	Building walk down conducted May 4 and

Not following site RMRS Waste Acceptance Criteria Procedure	RMRS	wastes are generated and stored in this building	not as LIT. This leads to an invalid inventory for these types of regulated wastes	PCBs are identified and entered into WEMS appropriately	5,1888, Bob Cathel, K-H, Cheryl Sayler, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alstatt, PE, and Dennis Mauser, RMRS Exhibits WEMS Report for Building 881 Photograph 50591-11
Observation	RMRS	Structural Equipment and Infrastructure Asbestos Containing Materials (ACM)	The building contains ceiling tiles and pipe insulation that have asbestos. Also some of the equipment has asbestos insulation	Locate and review previous asbestos surveys for this building. Post additional asbestos warning signs on and throughout the building as necessary Complete periodic inspections to verify that accessible ACM is not in state of disrepair. Perform any necessary O & M Recommend a one time baseline bulk air sampling in vital building areas that will continue to be accessed to verify that current asbestos air fiber counts meets permissible limits	Discussions with Don Clark, RMRS Henry Padron, RMRS, Dennis Mauser, RMRS, and Ken Fry, RMRS, on May 5, 1998 Exhibit: Photograph 50592-04
Lead Issues	RMRS	Lead based paint on exterior, interior, and equipment	Based on analytical data and process knowledge there is lead-contaminated paint throughout the building. Paint may also contain other heavy metals, including cadmium and chromium	Post warning signs as necessary Complete periodic inspections to verify that paint is not in state of disrepair Perform necessary O & M	Building walk down conducted May 4 and 5, 1998, Bob Cathel, K-H, Cheryl Sayler, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alstatt, PE, and Dennis Mauser, RMRS Discussions with Don Clark, RMRS Henry Padron, RMRS, Dennis Mauser, RMRS, and Ken Fry, RMRS, on May 5, 1998
Observation	RMRS				

Air Issues			
Observation	RMRS	Standby Emergency Diesel Generator	
		There are two emergency generators associated with this building Both of these are permitted under CDPHE-Air Pollution Control Division. Source is included in the Site Title V Operating Permit Application	If unit is kept in operational standby, maintain existing programs and recordkeeping. If unit is to not going to be kept in standby mode will need to empty associated diesel fuel tank
Observation	RMRS	Use of Ozone Depleting Substances (ODS) such as Chlorofluorocarbons (CFCs) (CAQCC Regulation No 15 and 40 CFR 82)	Building 881 has three (3)-registered chillers that will need to be emptied prior to removing these units from service There are also many refrigerators in this building that are registered with Air Quality
Observation	RMRS	Radionuclide Emissions from Building	There is the potential for hold-up in the ductwork and contamination of equipment, and building structure. The primary radionuclide defined in this building is depleted uranium. There is also known enriched uranium contamination. Based on recent information it is now suspected by some that plutonium may also be present in the building. Facility personnel interviewed during this assessment did not feel that plutonium would be found in this building
		(40 CFR Subpart H and CAQCC Regulation No 8)	Need to resolve the issue pertaining to suspected presence of TRU materials if confirmed additional evaluations will need to be conducted

Misc.	K-H RMRS DCI	Miscellaneous wastes/items remain within the facility	There are bags of trash containing what appear to be LLW. Most are not labeled as to their contents. In Room 255 was a bag of respirators with cartridges labeled as radioactive material. Numerous amounts of combustibles were observed throughout the building.	These wastes/items will have to be properly characterized and managed. Determine if the combustible loading requirements for the building are being exceeded and take appropriate actions	Building walk down conducted May 4 and 5, 1998, Bob Cathel, K-H, Cheryl Sayler, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alstatt, PE, and Dennis Mauser, RMRS Exhibits Photographs 50592-03, 50592-05, 50593-03, 50593-04, 50593-05, 50593-06, 50593-07, 50593-08
Potential Regulatory Deficiency	RMRS	Leaking Equipment	Several pieces of equipment were identified that were leaking significant amounts of lubricants, including the elevator in Room 309H	When conducting the equipment inventory identify all leaking pieces and determine characterization of waste generated and necessary repairs	Building walk down conducted May 4 and 5, 1998, Bob Cathel, K-H, Cheryl Sayler, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alstatt, PE, and Dennis Mauser, RMRS Exhibits Photographs 50593-03, 50593-12 and 50594-09
Observation	RMRS	Building has many areas where groundwater, precipitation enter	There are many areas where precipitation as well as groundwater enter the building. Some of these areas are the elevator shafts and sump pits. The elevator shafts release oil into the water. Room 286 sump had liquid in it at the time of this assessment. It is periodically pumped. To date analytical data indicates that there are no contaminants of concern and the liquid is generally released to the ground.	Conduct a walk down of the building to determine areas that need immediate repairs to ensure integrity of the area for personnel safety and safety of material in the area, i.e. waste containers, equipment	Building walk down conducted May 4 and 5, 1998, Bob Cathel, K-H, Cheryl Sayler, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alstatt, PE, and Dennis Mauser, RMRS Discussions with Don Clark, RMRS Henry Padron, RMRS, Dennis Mauser, RMRS, and Ken Fry, RMRS, on May 5, 1998

			Exhibits Photographs 50591-12, 50592-02, 50592-04, 50593-02, and 50594-03	Building walk down conducted May 4 and 5, 1998, Bob Cathel, K-H, Cheryl Sayler, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alstatt, PE, and Dennis Mauser, RMRS
Observation	K-H RMRS	Laboratory Hoods, furnaces and ovens	It appeared that two types of gasses are still piped into the hoods. Several Bunsen burners still had hoses attached to them The ovens and furnaces were not opened as part of the chemical verification	Determine if the gases are still hooked up and remove the hoses Determine if there are any chemicals remaining in any of the ovens and furnaces
Potential Regulatory Deficiency	RMRS	Industrial vacuum cleaners	There are numerous vacuum cleaners located throughout the building Two of the same types of units generated in Building 885 were characterized as LLM waste	If possible determine usage of these units and make a hazardous waste determination/characterization and manage as appropriate. If there is insufficient knowledge it may be necessary to sample
Observation	RMRS	Halon System	This system is scheduled to be drained by the middle of May 1998	If system is drained as planned there will be no future issues
				Building walk down conducted May 4 and 5, 1998, Bob Cathel, K-H, Cheryl Sayler, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alstatt, PE, and Dennis Mauser, RMRS Discussions with Don Clark, RMRS Henry Padron, RMRS, Dennis Mauser, RMRS, and Ken Fry, RMRS, on May 5, 1998

Potential Regulatory Deficiencies	RMRSS	Waste Containers not Labeled	There were several containers observed that were collecting liquid waste that were not labeled. In Building 887 a poly drum is being used to collect ground water but is not labeled as to its contents. IN Building 881, Room 121 a black poly drum was observed with a hose through the bung and but was not labeled.	Label all containers to ensure proper management and from a health and safety perspective	Building walk down conducted May 4 and 5, 1998, Bob Cathel, K-H, Cheryl Sayler, Proctor's Enterprise (PE), Kim Myers, PE, Catherine Alistatt, PE, and Dennis Mauser, RMRS Exhibits Photograph 50593-09
Observation	RMRSS	Uninterrupted Power Supply (UPS)	The bank of batteries for the UPS is located in the basement Periodic inspections are conducted of this unit	If kept in building will need to maintain inspections and necessary maintenance If the system is removed the batteries will have to be managed appropriately, i.e recycled	Discussions with Don Clark, RMRS Henry Padron, RMRS, Dennis Mauser, RMRS, and Ken Fry, RMRS, on May 5, 1998

881-2

ARRES. CONTROL
INCOMING LTR NO.

13962 RF 94

STATE OF COLORADO

Romer, Governor
de A. Nolan, MD, MPH, Executive Director

located to protecting and improving the health and environment of the people of Colorado

OCT 20 10 00 AM '94

CARDIUS MATERIALS AND WASTE MANAGEMENT DIVISION

3 Cherry Creek Dr. S.
Box, Colorado 80222-1530
Tel (303) 692-3300
Fax (303) 759-5355

222 S. 6th Street, Room 232
Grand Junction, Colorado 81501-2768
Phone (303) 248-7164
Fax (303) 248-7198

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

Colorado Department
of Public Health
and Environment



CTION

DIST.

JURLINGAME, A.H.

JSBY, W.S.

ARNIVAL, G.J.

DRDOVA, R.C.

AVIS, J.G.

REERA, D.W.

JAY, R.E.

EIS, J.A.

OVER, W.S.

PLAN, P.M.

ANNI, B.J.

ALY, T.J.

DAHL, T.G.

LIBIG, J.G.

LITCHINS, N.M.

ACKSON, D.T.

ELL, R.E.

ESTER, A.W.

ARX, G.E.

EDONALD, M.M.

CKENNA, F.G.

ORGAN, R.V.

ZZUTO, V.M.

DTTER, G.L.

ANDLIN, N.B.

ATTERWHITE, D.G.

ZHUBERT, A.L.

ZHWARTZ, J.K.

ETLOCK, G.H.

ZIGER, S.G.

ZBIN, P.M.

ZORHEIS, G.M.

ZLSON, J.M.

HOUK, R.Z.

Zollowell, J.

Mr. Steve Staten
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928

RE: Building 881 Footing Drain Discharge Water

Dear Mr. Staten

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division), has reviewed DOE's "Water Quality Evaluation of Building 881 Footing Drain Discharge with Recommendation for Discontinued Treatment". Based on information presented in this report and independent confirmation sampling, the Building 881 footing drain discharge water is compliant with the effluent ARARs for the Building 881 treatment facility and the OU 1 IM/IRA. Because of this, the Division approves discontinuing the collection and treatment of Building 881 footing drain discharge water in the OU 1 IM/IRA water treatment facility, on the condition that the discharge is handled in accordance with the proposed Industrial Area IM/IRA.

The Building 881 footing drain discharge water has been identified in the Proposed IM/IRA Decision Document for the Rocky Flats Industrial Area. This IM/IRA proposes to handle the 881 footing drain discharge water in accordance with similar footing drain water throughout RFETS as part of the Surface Water Discharge Determination for Foundation Drains and Utility Pits.

Although the Building 881 footing drain discharge water meets the ARARs for the OU 1 IM/IRA, the Division recognizes that the 881 footing drain discharge water has and may continue to exceed the Segment 5 Woman Creek Surface Water Standards. Discharge of this water to Woman Creek could result in a potential violation of the Clean Water Act. The data presented in this report indicates that the Building 881 footing drain discharge water has consistently been at or above the current Segment 5 Woman Creek discharge standards for Methylene Chloride, Gross Alpha, Gross Beta, and Total Uranium. The Division collected independent confirmation split samples on May 17, 1994 and July 13, 1994 for the Building 881 footing drain discharge water. The results from both sampling events indicate levels at or above the Segment 5 Woman Creek standards for Gross Alpha, Gross Beta, and Total Uranium. DOE's split sample results confirm levels of Gross Beta and Total Uranium above the discharge standards.

ARRES. CONTROL X
DMN RECORD/080
ATS/T130G

If you have any questions regarding this letter, please contact Chris Gilbreath at 692-3371.

Sincerely

Joe Schieffelin

Joe Schieffelin
Rocky Flats IAG Unit Leader
Facilities Section
Hazardous Waste Control Program

Reviewed for Addressee
Corres Control RFP

10-20-94 OWD
DATE BY

Ref Ltr #

DOE ORDER # 54001

cc S Grace, DOE
Z Houk, EG&G
T Reeves, AEI

G Kleeman, EPA
J Bruch, CDPHE-WQ
S Tarlton, CDPHE-OE

Memo

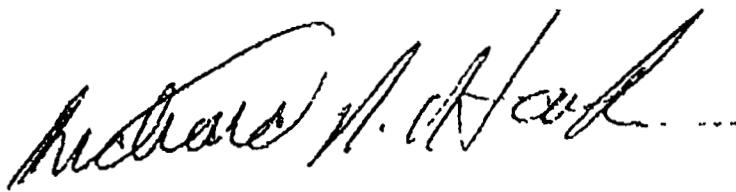
To: Bill Hiler, 881 Bldg, d5062, FAX 6075
From: R. Zeke Houk, OU 1
Cc: Annette Primrose, Russ Cirillo, Becky Hinsch
Subj: Building 881 Footing Drain

On October 7, 1994, the CDPHE approved discontinuing the collection and treatment of Building 881 footing drain water in the OU 1 IM/IRA water treatment plant (see attached letter from CDPHE).

At the present time, RFETS Engineering personnel are preparing plans to divert water from this footing drain system and its vertical risers directly to the SID with some type of permanent installation. At the present time, water is being pumped on a temporary basis from one of the risers. Since temporary fire hoses from the pumps would only freeze, it is necessary to pump this water onto the ground on the 881 Hillside, instead of conveying it directly to the SID by hoses.

At the present as an emergency measure to prevent groundwater from backing up into the 887 Building, I see no reason that would prevent discharging the footing drain water onto the ground.

In the long run, and certainly before the spring run-off season, it will be necessary to capture this water in a pipe or hose and convey it directly to the SID so that it would not infiltrate into the Hillside and into the French Drain for subsequent treatment in the 891 Building.



881-3

TOTAL CONTAINER DETAILED REPORT

05/06/98 07 06 AM

CONTAINER ID	BUILDING	UNIT	ROOM	LOCALE	WASTE TYPE	IDC CODE	CNTNR TYPE
D319990044	881	0	144		LLW	0861	DRO
D367190044	881	0	144		LLW	0861	DRO
D398930044	881	0	144		LLW	0861	DRO
D556690044000	881	0	144		LLW	0326	DRO
D57479004400370	881	0	144		LLW	0861	DRO
D576140044000	881	0	144		LLW	0326	DRO
D58976088900006	881	0	144		LLW	0861	DRO
D597700044000	881	0	144		LLW	0326	DRO
D599720044	881	0	144		LLW	0861	DRO
D639610044	881	0	144		LLW	0861	DRO
D66270004400002	881	0	144		LLW	0861	DRO
D662740044	881	0	144		LLW	0861	DRO
D67349004400851	881	0	144		LLW	0374	DRO
D681720044	881	0	144		LLW	0861	DRO
D712620044000	881	0	144		LLW	0326	DRO
D739350044	881	0	144		LLW	0861	DRO
D739430044	881	0	144		LLW	0861	DRO
D741660044	881	0	144		LLW	0861	DRO
D741670044	881	0	144		LLW	0861	DRO
D74442004400391	881	0	144		LLW	0861	DRO
D744440044	881	0	144		LLW	0861	DRO
D746220044	881	0	144		LLW	0335	DRO
D746270044	881	0	144		LLW	0861	DRO
D74631004400380	881	0	144		LLW	0861	DRO
D746340044	881	0	144		LLW	0861	DRO
D74635004400651	881	0	144		LLW	0326	DRO
D74640004400003	881	0	144		LLW	0861	DRO
D74998004501077	881	0	144		LLW	0337	DRO
D75000004501110	881	0	144		LLW	0330	DRO
D750140044	881	0	144		LLW	0861	DRO
D750220044	881	0	144		LLW	0326	DRO
D75045004501096	881	0	144		LLW	0337	DRO
D75046004501101	881	0	144		LLW	0330	DRO
D75047004501074	881	0	144		LLW	0330	DRO
D75048004501075	881	0	144		LLW	0330	DRO
D75049004501073	881	0	144		LLW	0330	DRO
D75050004501069	881	0	144		LLW	0337	DRO
D750510070	881	0	144		LLW	0330	DRO
D75052004501093	881	0	144		LLW	0330	DRO
D75053004501100	881	0	144		LLW	0330	DRO
D750540070	881	0	144		LLW	0330	DRO
D75055004501107	881	0	144		LLW	0330	DRO
D75056004501097	881	0	144		LLW	0330	DRO
D75057004501099	881	0	144		LLW	0337	DRO
D75058004501105	881	0	144		LLW	0330	DRO
D75059004501108	881	0	144		LLW	0330	DRO
D75060004501086	881	0	144		LLW	0330	DRO
D75061004501094	881	0	144		LLW	0330	DRO
D75062004501071	881	0	144		LLW	0330	DRO

TOTAL CONTAINER DETAILED REPORT

05/06/98 07 06 AM

CONTAINER ID	BUILDING	UNIT	ROOM	LOCALE	WASTE TYPE	IDC CODE	CNTNR TYPE
D750830070	881	0	144		LLW	0330	DRO
D75084004501095	881	0	144		LLW	0330	DRO
D75085004501098	881	0	144		LLW	0330	DRO
D75086004501091	881	0	144		LLW	0330	DRO
D75087004501106	881	0	144		LLW	0337	DRO
D75088004501070	881	0	144		LLW	0330	DRO
D75089004501123	881	0	144		LLW	0330	DRO
D75090004501064	881	0	144		LLW	0330	DRO
D75091004501076	881	0	144		LLW	0330	DRO
D750920070	881	0	144		LLW	0330	DRO
D75093004501081	881	0	144		LLW	0337	DRO
D75094004501165	881	0	144		LLW	0330	DRO
D75095004501080	881	0	144		LLW	0337	DRO
D75096004501066	881	0	144		LLW	0330	DRO
D750970070	881	0	144		LLW	0337	DRO
D75098004501067	881	0	144		LLW	0330	DRO
D75099004501126	881	0	144		LLW	0337	DRO
D75100004501151	881	0	144		LLW	0330	DRO
D75101004501146	881	0	144		LLW	0330	DRO
D75102004501103	881	0	144		LLW	0330	DRO
D75103004501102	881	0	144		LLW	0330	DRO
D75104004501083	881	0	144		LLW	0863	DRO
D75105004501169	881	0	144		LLW	0337	DRO
5106	881	0	144		EMT	0888	DRO
D75107004501088	881	0	144		LLW	0330	DRO
D75108004501152	881	0	144		LLW	0330	DRO
D75109004501179	881	0	144		LLW	0337	DRO
D75110004501072	881	0	144		LLW	0337	DRO
D75111004501162	881	0	144		LLW	0330	DRO
D75112004501084	881	0	144		LLW	0330	DRO
D75113004501163	881	0	144		LLW	0330	DRO
D75114004501092	881	0	144		LLW	0330	DRO
D75115004501104	881	0	144		LLW	0330	DRO
D75116004501089	881	0	144		LLW	0330	DRO
D75117004501090	881	0	144		LLW	0337	DRO
D75118007001131	881	0	144		LLW	0330	DRO
D751190070	881	0	144		LLW	0337	DRO
D75120004501082	881	0	144		LLW	0330	DRO
D751210070	881	0	144		LLW	0330	DRO
D75122004501068	881	0	144		LLW	0330	DRO
D75123007000001	881	0	144		LLW	0330	DRO
D75124004501087	881	0	144		LLW	0330	DRO
D75125004501085	881	0	144		LLW	0330	DRO
D75126004501079	881	0	144		LLW	0330	DRO
D751270070	881	0	144		LLW	0330	DRO
D75128004501065	881	0	144		LLW	0480	DRO
D75129004501109	881	0	144		LLW	0330	DRO
D75130004501181	881	0	144		LLW	0330	DRO
D75131004501168	881	0	144		LLW	0337	DRO
D75132004501078	881	0	144		LLW	0330	DRO
D752350044	881	0	144		LLW	0861	DRO

TOTAL CONTAINER DETAILED REPORT

05/06/98 07 06 AM

CONTAINER ID	BUILDING	UNIT	ROOM	LOCALE	WASTE TYPE	IDC CODE	CNTNR TYPE
D752370044	881	0	144		LLW	0861	DRO
D75241004400389	881	0	144		LLW	0863	DRO
D75243004400376	881	0	144		LLW	0861	DRO
D75296004501128	881	0	144		LLW	0330	DRO
D75297004501136	881	0	144		LLW	0330	DRO
D75298004501129	881	0	144		LLW	0480	DRO
D75299004501138	881	0	144		LLW	0330	DRO
D75300004501142	881	0	144		LLW	0330	DRO
D75301007000002	881	0	144		LLW	0330	DRO
D75302004501141	881	0	144		LLW	0330	DRO
D75303004501177	881	0	144		LLW	0330	DRO
D75304004501116	881	0	144		LLW	0330	DRO
D75305004501124	881	0	144		LLW	0330	DRO
D75306004501115	881	0	144		LLW	0337	DRO
D75307004501112	881	0	144		LLW	0330	DRO
D75308004501133	881	0	144		LLW	0330	DRO
D75309004501132	881	0	144		LLW	0330	DRO
D75310004501137	881	0	144		LLW	0330	DRO
D75311004501111	881	0	144		LLW	0330	DRO
D75313004501125	881	0	144		LLW	0330	DRO
D75314004501149	881	0	144		LLW	0330	DRO
D75316004501150	881	0	144		LLW	0330	DRO
D75317004501148	881	0	144		LLW	0330	DRO
D75318004501122	881	0	144		LLW	0330	DRO
D75319004501175	881	0	144		LLW	0330	DRO
D75320	881	0	144		LLW	0000	DRO
D75321007000062	881	0	144		LLW	0861	DRO
D75322004501178	881	0	144		LLW	0330	DRO
D75324004501130	881	0	144		LLW	0330	DRO
D75325004501117	881	0	144		LLW	0330	DRO
D75326004501114	881	0	144		LLW	0330	DRO
D75327004501113	881	0	144		LLW	0337	DRO
D75328004501164	881	0	144		LLW	0330	DRO
D753290070	881	0	144		LLW	0330	DRO
D75330004501120	881	0	144		LLW	0330	DRO
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D75334007000069	881	0	144		LLW	0861	DRO
D75335004501119	881	0	144		LLW	0330	DRO
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D75338004501121	881	0	144		LLW	0330	DRO
D75340004501143	881	0	144		LLW	0330	DRO
D753410070	881	0	144		LLW	0330	DRO
D75342004501167	881	0	144		LLW	0480	DRO
D75343004501140	881	0	144		LLW	0330	DRO
D75344004501118	881	0	144		LLW	0336	DRO
D755200044	881	0	144		LLW	0861	DRO
D756810044	881	0	144		LLW	0326	DRO
D756860044	881	0	144		LLW	0326	DRO
D75688004400449	881	0	144		LLW	0326	DRO
D756890044	881	0	144		LLW	0861	DRO

TOTAL CONTAINER DETAILED REPORT

05/06/98 07 06 AM

CONTAINER ID	BUILDING	UNIT	ROOM	LOCALE	WASTE TYPE	IDC CODE	CNTNR TYPE
D757980044	881	0	144		LLW	0861	DRO
D758000044	881	0	144		LLW	0861	DRO
D758070044	881	0	144		LLW	0861	DRO
D758080044	881	0	144		LLW	0861	DRO
D758090044	881	0	144		LLW	0861	DRO
D758100044	881	0	144		LLW	0861	DRO
D761250044	881	0	144		LLW	0861	DRO
D761270044	881	0	144		LLW	0861	DRO
D763470044	881	0	144		LLW	0326	DRO
D763490044	881	0	144		LLW	0326	DRO
D763510044	881	0	144		LLW	0326	DRO
D76504007000001	881	0	144		LLW	0337	DRO
D76505004501154	881	0	144		LLW	0330	DRO
D76506004501145	881	0	144		LLW	0330	DRO
D765070070	881	0	144		LLW	0480	DRO
D76508	881	0	144		LLW	0330	DRO
D76509004501172	881	0	144		LLW	0330	DRO
D76510004501180	881	0	144		LLW	0330	DRO
D76511004501176	881	0	144		LLW	0330	DRO
D76512004501171	881	0	144		LLW	0330	DRO
D76513004501173	881	0	144		LLW	0330	DRO
D76514004501174	881	0	144		LLW	0480	DRO
D76515004501182	881	0	144	D13	LLW	0330	DRO
55160070	881	0	144		LLW	0330	DRO
D76517004501147	881	0	144		LLW	0330	DRO
D76518004501144	881	0	144		LLW	0330	DRO
D767960044	881	0	144		LLW	0326	DRO
D76800004400001	881	0	144		LLW	0326	DRO
D768070044	881	0	144		LLW	0861	DRO
D768090044	881	0	144		LLW	0326	DRO
D76810004400001	881	0	144		LLW	0861	DRO
D770370044	881	0	144		LLW	0861	DRO
D770380044	881	0	144		LLW	0861	DRO
D770430044	881	0	144		LLW	0861	DRO
D773200044	881	0	144		LLW	0861	DRO
D773210044	881	0	144		LLW	0861	DRO
D773260044	881	0	144		LLW	0326	DRO
D773310044	881	0	144		LLW	0861	DRO
D773950070	881	0	144		LLW	0337	DRO
D77396007000001	881	0	144		LLW	0337	DRO
D77397	881	0	144		EMT	0888	DRO
D77398007000001	881	0	144		LLW	0326	DRO
D77399	881	0	144		EMT	0888	DRO
D774000070	881	0	144		LLW	0480	DRO
D774820044	881	0	144		LLW	0326	DRO
D774840044	881	0	144		LLW	0861	DRO
D77485004400001	881	0	144		LLW	0861	DRO
D774860044	881	0	144		LLW	0861	DRO
D77487004400001	881	0	144		LLW	0861	DRO
D77489004400001	881	0	144		LLW	0861	DRO
D774900044	881	0	144		LLW	0861	DRO

TOTAL CONTAINER DETAILED REPORT

05/06/98 07 06 AM

CONTAINER ID	BUILDING	UNIT	ROOM	LOCALE	WASTE TYPE	IDC CODE	CNTNR TYPE
D774910044	881	0	144		LLW	0861	DRO
D774940044	881	0	144		LLW	0861	DRO
D774970044	881	0	144		LLW	0861	DRO
D774980044	881	0	144		LLW	0861	DRO
D775010044	881	0	144		LLW	0861	DRO
D777630044	881	0	144		LLW	0861	DRO
D777640044	881	0	144		LLW	0861	DRO
D77765004400001	881	0	144		LLW	0861	DRO
D777660044	881	0	144		LLW	0861	DRO
D777670044	881	0	144		LLW	0861	DRO
D777710044	881	0	144		LLW	0861	DRO
D777740044	881	0	144		LLW	0326	DRO
D777750044	881	0	144		LLW	0861	DRO
D777770044	881	0	144		LLW	0861	DRO
D777780044	881	0	144		LLW	0861	DRO
D777790044	881	0	144		LLW	0861	DRO
D777800044	881	0	144		LLW	0861	DRO
D779560044	881	0	144		LLW	0861	DRO
D779570044	881	0	144		LLW	0861	DRO
D779590044	881	0	144		LLW	0861	DRO
D77963004400001	881	0	144		LLW	0861	DRO
D77964004400001	881	0	144		LLW	0861	DRO
D779660044	881	0	144		LLW	0861	DRO
D79670044	881	0	144		LLW	0861	DRO
D779680044	881	0	144		LLW	0861	DRO
D77969004400001	881	0	144		LLW	0861	DRO
D779780044	881	0	144		LLW	0861	DRO
D78701	881	0	144		LLW	0326	DRO
D78703004400001	881	0	144		LLW	0326	DRO
D789500063	881	0	144		LLW	0480	DRO
D79362006300097	881	0	144		LLW	0480	DRO
D79363006300096	881	0	144		LLW	0480	DRO
D79364006300098	881	0	144		LLW	0480	DRO
D793730063	881	0	144		LLW	0480	DRO
D79435004400740	881	0	144		LLW	0863	DRO
D79593004400669	881	0	144		LLW	0480	DRO
D79594004400324	881	0	144		LLW	0326	DRO
D79601004400001	881	0	144		LLW	0861	DRO
D80119004400535	881	0	144		LLW	0863	DRO
D808080063	881	0	144		LLW	0374	DRO
D80809	881	0	144		LLW	0338	DRO
D81643	881	0	144		LLW	0480	DRO
D81742	881	0	144		LLW	0480	DRO
D82123004400872	881	0	144		LLW	0480	DRO
D82124004400871	881	0	144		LLW	0480	DRO
D82606004400906	881	0	144		LLW	0480	DRO
D82709004400907	881	0	144		LLW	0480	DRO
D828520063	881	0	144		LLW	0861	DRO
D82858	881	0	144		LLW	0000	DRO
D3220	881	0	144		LLW	0326	DRO
D83554004400971	881	0	144		LLW	0326	DRO

TOTAL CONTAINER DETAILED REPORT

05/06/98 07 06 AM

CONTAINER ID	BUILDING	UNIT	ROOM	LOCALE	WASTE TYPE	IDC CODE	CNTNR TYPE
D83559004400969	881	0	144		LLW	0326	DRO
D83607	881	0	144		EMT	0888	DRO
D83608	881	0	144		LLW	0201	DRO
D83612	881	0	144		LLW	0326	DRO
D83616	881	0	144		LLW	0201	DRO
D83619	881	0	144		EMT	0888	DRO
D83622	881	0	144		LLW	0326	DRO
D83625004400970	881	0	144		LLW	0326	DRO
D83800	881	0	144		LLW	0440	DRO
D83806	881	0	144		LLW	0326	DRO
D84465	881	0	144		LLW	0326	DRO
D84654	881	0	144		EMT	0888	DRO
D84655	881	0	144		EMT	0888	DRO
D84656	881	0	144		EMT	0888	DRO
D85006	881	0	144		LLW	0326	DRO
D85026	881	0	144		LLW	0326	DRO
D85029004400825	881	0	144		LLW	0862	DRO
D85034	881	0	144		EMT	0888	DRO
D85037	881	0	144		EMT	0888	DRO
D85039	881	0	144		EMT	0888	DRO
D85043	881	0	144		LLW	0326	DRO
D85044	881	0	144		LLW	0326	DRO
D85047	881	0	144		LLW	0863	DRO
D85418	881	0	144		LLW	0440	DRO
D85737	881	0	144		LLW	0541	DRO
D85741	881	0	144		LLW	0541	DRO
D85742	881	0	144		LLW	0440	DRO
D85743	881	0	144		LLW	0326	DRO
D85745	881	0	144		LLW	0863	DRO
D85747	881	0	144		LLW	0326	DRO
D85748	881	0	144		LLW	0326	DRO
D85749	881	0	144		LLW	0326	DRO
D85752	881	0	144		LLW	0863	DRO
D85753	881	0	144		LLW	0541	DRO
D85755	881	0	144		LLW	0440	DRO
D86239	881	0	144		LLW	0863	DRO
D86243	881	0	144		LLW	0326	DRO
D86245	881	0	144		LLW	0440	DRO
D86247	881	0	144		LLW	0326	DRO
D86248	881	0	144		LLW	0326	DRO
D86249	881	0	144		LLW	0326	DRO
D86250	881	0	144		LLW	0326	DRO
D86252	881	0	144		LLW	0326	DRO
D86253	881	0	144		LLW	0863	DRO
D86255	881	0	144		LLW	0326	DRO
D86256	881	0	144		LLW	0863	DRO
D86257	881	0	144		LLW	0326	DRO
D86260	881	0	144		LLW	0326	DRO
D86261	881	0	144		LLW	0863	DRO
D86101	881	0	144		LLW	0326	DRO
D87105	881	0	144		LLW	0326	DRO

TOTAL CONTAINER DETAILED REPORT

05/06/98 07:06 AM

CONTAINER ID	BUILDING	UNIT	ROOM	LOCALE	WASTE TYPE	IDC CODE	CNTNR TYPE
D87106	881	0	144		LLW	0863	DRO
D87107	881	0	144		LLW	0326	DRO
D87344	881	0	144		LLW	0326	DRO
D87346	881	0	144		LLW	0863	DRO
D87347	881	0	144		LLW	0863	DRO
D87349	881	0	144		LLW	0326	DRO
D87355	881	0	144		LLW	0326	DRO
D87356	881	0	144		LLW	0326	DRO
D88059	881	0	144		LLW	0863	DRO
D88062	881	0	144		LLW	0863	DRO
H039580044	881	0	144		LLW	0480	BHW
O00721	881	0	144		EMT	0888	DOP
P00500007000086	881	0	144		LLW	0326	BFW
P00663	881	0	144		LLW	0326	BFW
P00857	881	0	144		LLW	0326	BFW
P00861	881	0	144		LLW	0480	BFW
P013080044	881	0	144		LLW	0326	BFW
P01336	881	0	144		EMT	0888	BFW
P01388	881	0	144		LLW	0326	BFW
P013890044	881	0	144		LLW	0438	BFW
P01390	881	0	144		LLW	0480	BFW
P01484	881	0	144		LLW	0480	BFW
P01485	881	0	144		LLW	0480	BFW
P01486	881	0	144		LLW	0480	BFW
P01516	881	0	144		LLW	0326	BFW
P01517	881	0	144		LLW	0326	BFW
P01626	881	0	144		LLW	0326	BFW
P01627	881	0	144		LLW	0480	BFW
P01628	881	0	144		EMT	0888	BFW
P01630	881	0	144		EMT	0888	BFW
R00583	881	0	144		EMT	0888	DRB
R00584	881	0	144		EMT	0888	DRB
R00778	881	0	144		EMT	0888	DRB
R00795	881	0	144		EMT	0000	DRB
R00796	881	0	144		EMT	0000	DRB
R00797	881	0	144		EMT	0888	DRB
R00812	881	0	144		LLW	0535	DRB
R00814	881	0	144		LLW	0535	DRB
R00836	881	0	144		LLW	0535	DRB
X03619	881	0	144		LLW	0529	DTG
X04056088102908	881	0	144		LLW	0541	CND
X04057	881	0	144		LLW	0326	DTG

WEMF_2500

WASTE AND ENVIRONMENTAL MANAGEMENT SYSTEM

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TOTAL CONTAINER DETAILED REPORT

05/06/98 07 06 AM

BUILDING 881 UNIT 0 ROOM 144

TOTAL CONTAINERS 346

TOTALS(S) BY WASTE TYPE EMT 21
LLW 325

TOTAL(S) BY CONTAINER TYPE BFW 18
BHW 1
CND 1
DOP 1
DRB 9
DRO 314
DTG 2

SELECTION CRITERIA

LOCALE ALL
WASTE TYPE ALL
CONTAINER TYPE. ALL
BUILD/UNIT/ROOM '881 0 144'

881-4

RCRA DAILY TANK AND ANCILLARY
EQUIPMENT INSPECTION,
BUILDINGS 881 AND 887

10/03/94

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BUILDING 887 TANK INSPECTION LOGSHEET
STORAGE/TREATMENT TANKS 183, 184, 185, 802A, 802B, 802C, 802D

This logsheet must be filled out completely and accurately on the day of inspection.

	Day 1	Day 2	Day 3	Day 4	Day 5	Day 6	Day 7
Date	7-21-97	7-22-97	7-23-97	7-24-97	7-25-97	7-26-97	7-27-97
Time	0825	0850	0930	0933	0900	0910	0830
Employee No	509514	517594	519162	509514	509514	510273	510273
Signature of RCRA Custodian	<i>Edith</i>	<i>D.P. Brown</i>	<i>J.E. Treadwell</i>	<i>Edith</i>	<i>Edith</i>	<i>Edith</i>	<i>Edith</i>
Signature of Owner	<i>Other</i>	<i>IPCO</i>	<i>IPCO</i>	<i>IPCO</i>	<i>IPCO</i>	<i>IPCO</i>	<i>IPCO</i>
Prerequisites Complete	yes	yes	yes	yes	yes	yes	yes

Answer YES, NO or N/A to the following

1 Was the last inspection within 24 hours?	YES						
2 Are area signs conspicuously posted and correct?	YES						
3 Is spill response equipment accessible, adequate and in good working condition?	YES	NO	NO	NO	NO	NO	NO
4 Is the secondary containment free of chips, cracks, gaps, and corrosion?	NO						
5 Is the secondary containment free of liquid?	YES						
6 Is the tank in good condition and not leaking?	NO						
7 Is the ancillary equipment in good condition and not leaking?	NO						
8 Is the hazardous waste compatible with the tank?	YES						
9 Is the aisle space adequate?	YES						
10 Is the monitoring equipment operable?	N/A						
11 Is the overfill prevention equipment operable?	YES						

NOTES

- Supervision and the Environmental Coordinator Building Manager and RCRA Unit Owner are notified of any problems
- Questions answered NO or N/A require an explanation in the Comments section (next page). Deficiencies to be corrected by a work order require completion of the Corrective Actions section (next page)
- Signature of the Owner is required if a NO response is indicated

**RCRA DAILY TANK AND ANCILLARY
EQUIPMENT INSPECTION,
BUILDINGS 881 AND 887**

10/03/94

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Comments

Questions & Comentable of Waste To Trade is here Questioned

Memo due from C Hoerl to answer
to Board orders written to address
superior of books & report (var) 4000

BUILDING 887 TANK INSPECTION LOGSHEET
STORAGE/TREATMENT TANKS 183, 184, 185, 802A, 802B, 802C, 802D

This logsheet must be filled out completely and accurately on the day of inspection.

	Day 1	Day 2	Day 3	Day 4	Day 5	Day 6	Day 7
Date	3/16/98	3/17/98	3/18/98	3/19/98	3/20/98	3/31/98	3/22-98
Time	0755	10:43	0803	0815	0903	1113	0810
Employee No	509516	509516	509516	509516	509516	518162	518162
Signature of RCRA Custodian	<i>[Signature]</i>						
Signature of Owner	<i>[Signature]</i>						
Prerequisites Complete	YES						

Answer YES, NO, or N/A to the following

1 Was the last inspection within 24 hours?	YES						
2 Are area signs conspicuously posted and correct?	YES						
3 Is spill response equipment accessible, adequate, and in good working condition?	YES						
4 Is the secondary containment free of chips, cracks, gaps, and corrosion?	NO						
5 Is the secondary containment free of liquid?	NO						
6 Is the tank in good condition and not leaking?	NO						
7 Is the ancillary equipment in good condition and not leaking?	NO						
8 Is the hazardous waste compatible with the tank?	UNKNOWN						
9 Is the aisle space adequate?	YES						
10 Is the monitoring equipment operable?	N/A						
11 Is the overfill prevention equipment operable?	YES						

NOTES

- 1 Supervision and the Environmental Coordinator, Building Manager, and RCRA Unit Owner are notified of any problems
- 2 Questions answered NO or N/A require an explanation in the Comments section (next page). Deficiencies to be corrected by a work order require completion of the Corrective Actions section (next page)
- Signature of the Owner is required if a NO response is indicated

3/16/98 thru 3/22/98

10/03/94

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Comments

- Photo 4 - Paint bubbles, walls, shows evidence of breach, also tanks

Footings, paint chips

Feb # 6 - Tank A-302 Flange bolts have evidence of leakage

Feb # 6 - Valve (V-1411) has evidence of leakage

Feb # 6 - Tank (B-822) has evidence of leakage C bottom of tank

Feb # 6 - Between Tanks D-184, D-185, evidence of leakage; Rust is present

Feb # 7 - (new) Pump has corrosion and rust @ suction fittings

Feb # 8 - Compressor unknown -

5 - Site BOTTES has liquid in it

CDPH&E agreed to allow the use of the process system for elementary neutralization. A tracer will be added to the neutralization to detect primary breach beginning 3/16/98 on 3/18/98 tracer fluid was detected in secondary containment. The above activity was suspended # 6 has been completed T0094370 Another work order has been generated to repaint the floor Reference CCA-S3-Q7 for remaining items.

APPENDIX 3

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STORAGE/IREALIMENT TANKS 183, 184, 185, 802A, 802B, 802C, 802D
This logsheet must be filled out completely and accurately on the day of inspection.

	Day 1	Day 2	Day 3	Day 4	Day 5	Day 6	Day 7
Date	10-30-94	11-07	12-2-94	13-9-97	14-9-97	02-05-97	02-06-97
Time	0755	0748	0745	0900	0858	0832	0830
Employee No	510773	509516	510773	509684	509684	510773	510773
Signature of RCRA Custodian	S. J. H.	Eugene John	John	John	John	John	John
*Signature of Owner	Hall	Hall	Hall	Hall	Hall	Hall	Hall
Prerequisites Complete	yes	yes	yes	yes	yes	yes	yes

Answer YES, NO, or N/A to the following

1 Was the last inspection within 24 hours?	YES						
2 Are area signs conspicuously posted and correct?	YES						
3 Is spill response equipment accessible, adequate, and in good working condition?	YES						
4 Is the secondary containment free of chips, cracks, gaps, and corrosion?	NOC						
5 Is the secondary containment free of liquid?	YES						
6 Is the tank in good condition and not leaking?	NOC						
7 Is the ancillary equipment in good condition and not leaking?	NOC						
8 Is the hazardous waste compatible with the tank?	NO	YES	NO	NO	NO	NO	NO
9 Is the aisle space adequate?	YES						
10 Is the monitoring equipment operable?	N/A						
11 Is the overfill prevention equipment operable?	YES						

NOTES

- Supervision and the Environmental Coordinator, Building Manager, and RCRA Unit Owner are notified of any problems
- Questions answered NO or N/A require an explanation in the Comments section (next page). Deficiencies to be corrected by a work order require completion of the Corrective Actions section (next page)
- Signature of the Owner is required if a NO response is indicated

APPENDIX 3

Page 2 of 2

Comments

~~SEE Previous pages~~

Question #8. If compatible Then why do we have
Corrosion and Rust, also bonding?

Work orders have been
written to repair leak &
repaint floor - believe most
of floors it is now age of equipment

RCRA DAILY TANK AND ANCILLARY
EQUIPMENT INSPECTION,
BUILDINGS 881 AND 887

10/03/92

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BUILDING 887 TANK INSPECTION LOGSHEET
STORAGE/REACTANT TANKS 183, 184, 185, 802A, 802B, 802C, 802D

This logsheet must be filled out completely and accurately on the day of inspection.

	Day 1	Day 2	Day 3	Day 4	Day 5	Day 6	Day 7
Date	4-12-98	4-12-98	4-12-98	4-12-98	4-12-98	4-12-98	4-12-98
Time	0740	0755	0803	0900	0954	0825	0755
Employee No	SCS 516						
Signature of RCRA Custodian	<i>E.J. Johnson</i>						
Signature of Owner							
Prerequisites Complete	YES						

All wtr YES, NO or N/A to the following

- 1 Was the last inspection within 24 hours?
- 2 Are area signs conspicuously posted and correct?
- 3 Is spill response equipment accessible, adequate and in good working condition?
- 4 Is the secondary containment free of chips, cracks, holes, and other tank?
- 5 Is ancillary equipment in good condition and not leaking?
- 6 Is the tank in good condition and not leaking?
- 7 Is the ancillary equipment in good condition and not leaking?
- 8 Is the hazardous waste compatible with the tank?
- 9 Is the tank in proper orientation?
- 10 Is the monitoring equipment operable?
- 11 Is the overfill prevention equipment operable?

NOTES

1 Supervision and the Environmental Coordinator, Building Manager, and RCRA Unit Owner are notified of any problems

2 Questions answered NO or N/A require an explanation in the Comments section (next page). Deficiencies to be corrected by a work order require completion of the Corrective Actions section (next page). Signature of the Owner is required if a NO response is indicated

APR 6 1998 APR 12 1998

Comments

- # 4 - Paint bubbles, walls show evidence of Branch, Abs Trunks
Footings, Joint Chgs

file - Tank A-802 Flange Bolts have evidence of denting
file - Valve (V-411) has evidence of denting

file - Tank (B-802) has evidence of denting @ Bottom of Tank

file - Between Trunks D-184 D-185, evidence of denting; Rust is Present

file - Pump has corrosion due Rust @ suction fittings
file - Corrosion, unknown -
file - Rust Liquefied in S. N - Birth &

All processes have been terminated # 6 has been completed
T0094370 Another work order has been generated to repaint the floor. Reference CCA-53-97 for remaining items

Corrective Actions

A AND ANCILLARY
PERFECTION,
A AND 887

10/03/94

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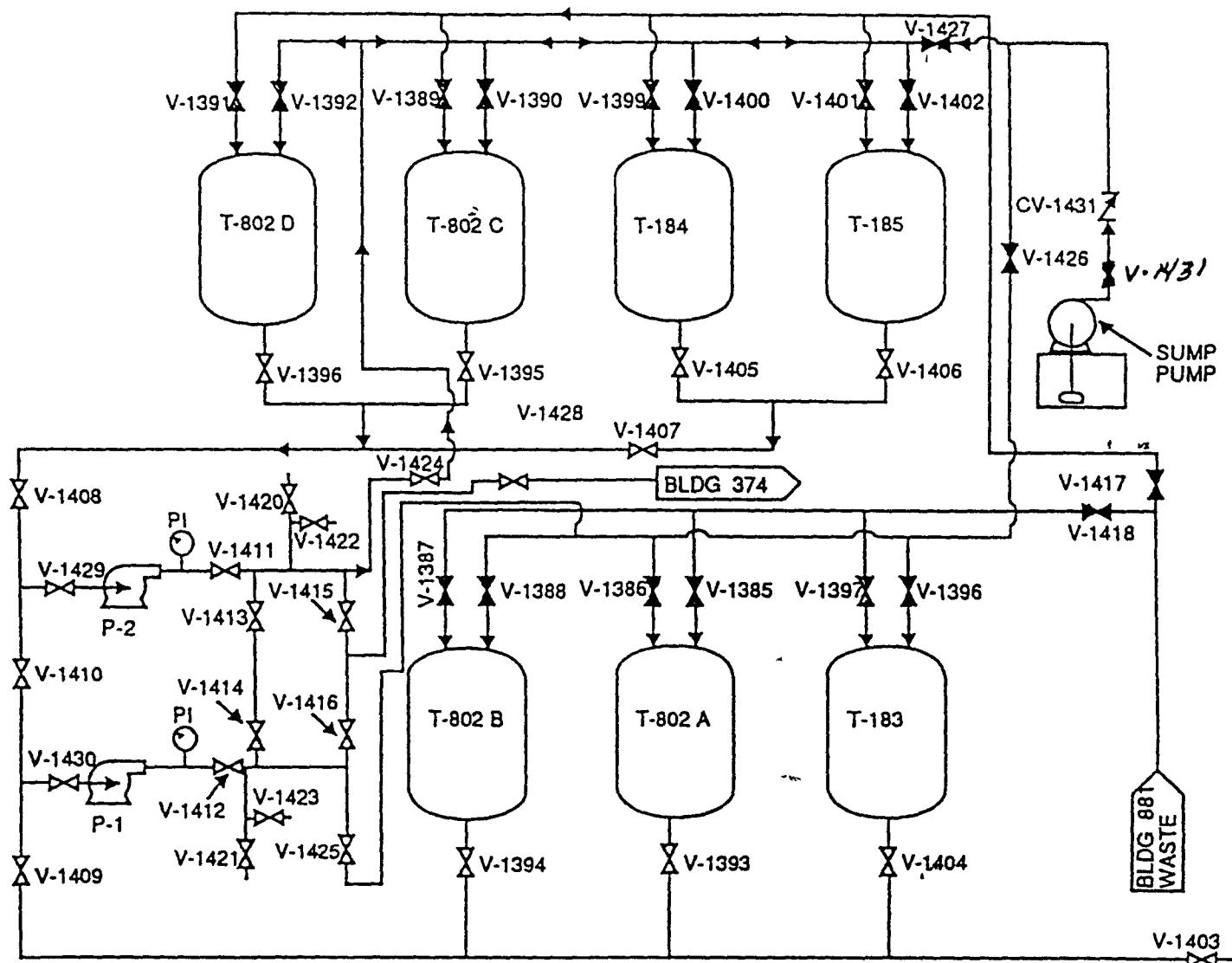


Figure 4.1: Building 881 Process Waste Collection Systems 1 and 2

881-6

ASBES, INVENTORY

BUILDING	PRI	ROOM	DATE	LOCATION	COMMENTS	STATUS COMMENTS
				90 SOUTH OF ROOM 15A STEAM LINE 125 AT 7 LEVEL RUNNING	HEAVY DAMAGE TO STEAM LINE 125	COMPLETE
881	1	12	3/17/92	NORTH TO SOUTH CONDENSATE STEAM LINE END 5' WEST COLUMN H-9 1" AT 10' LEVEL	OIL EXPOSED, VERY FRIABLE INSULATION (2) OTHER DAMAGED AREAS ON LINE (LESS SEVERE)	COMPLETE
881	1	122	3/17/92	CONDENSATE STEAM 2" LINE AT SOUTH WALL 10' WEST OF COLUMN H-9	DAMAGED AND EXPOSED INSULATION	COMPLETE
881	1	122	3/17/92	3 ARES ON PROCESS HOT WATER LINE FROM (1' LINE 6'-2' LEVEL NE CORNER OF ROOM	DAMAGED UNENCAPSULATED FLUFFY INSULATION NE CORNER OF ROOM	COMPLETE
881	1	138	3/17/92	WESTEND OF ROOM 114L MEZZANINE AT DOOR 59 7' OVER HEAD	(5) PIPE ENDS AT BRACKET (2) ENDS IN ELECTRICIAN'S CAGE	COMPLETE
881	1	1114L	3/17/92	93' SOUTH OF ROOM 15A ON STEAM 80 LINE RUNNING N-S AT 8' LEVEL	HEAVY DAMAGE AT BRACKET ON STEAM LINE	COMPLETE
881	1	12	3/17/92	8" CONDENSATE STEAM 80 LINE OVER WESTEND	MINOR DEBRIS ON GROUND - BADLY EXPOSED END AT FLOOR	COMPLETE
881	1	212	3/17/92	VAULT AREA - CONDENSATE STEAM LINE OVER WESTEND SHELVES	MULTIPLE EXPOSED ENDS	COMPLETE
881	1	214B	3/17/92	VAULT AREA - NW CORNER AT REGULATOR STEAM 80	MULTIPLE EXPOSED DAMAGE DAREAS	COMPLETE
881	1	214B	3/17/92	CENTER OF CEILING AT ELECTRICAL OUTLET	DAMAGED TROWLED ON FIREPROOFING/CEILING MATERIAL AT ELECTRICAL OUTLET	ENCAPSOLATED 8/23/94 TLO#76536
881	1	154F	4/1/92	CENTER OF CEILING AT ELECTRICAL OUTLET	DAMAGE TO TROWLED ON FIREPROOFING/CEILING MATERIAL AT ELECTRICAL OUTLET	ENCAPSOLATED 8/23/94 TLO#76536
881	1	154G	4/1/92			

ASBES, INVENTORY

				45' X 25' AREA NORTH CORNER OF MEZZANINE	45' X25' AREA SHOULD BE REENCAP- SULATED ON A REGULAR BASIS FIRE- PROOFING IN EXCELLENT CONDITION	PROBLEM STILL EXISTS
881	2	114L	3/17/92	OUTSIDE (SOUTHSIDE) STEAM LINE SUPPLY TO COOLING TOWER #2 SPRAY FANS (WESTSIDE OF FANS)	DAMAGED INSULATION AND JACKET (3 NONFRIABLE SHAPE AREAS)	COMPLETE
881	3		3/17/92	NEAR DOORWAY AND INSIDE ROOM #113C ON PROCESS HOT WATER, DISTILLED WATER COOLING WATER SUPPLY #3 AND STEAM 15' LINES ALL RUNNING NORTH TO SOUTH (17 AREAS)	MULTIPLE DAMAGED AREAS (17) ALL TAPED OVER	COMPLETE
881	3	113	3/17/92	VALVE ARRAY EAST WALL	STEAM 15 EXPOSED ENDS	COMPLETE
881	3	280A	3/17/92	HEATER AT VALVE 881135 EASTSIDE OF ROOM	(1). EXPOSED END	COMPLETE
881	3	284	3/17/93	VALVE OVER SINK AT EASTEND OF ROOM OFF 1" CONDENSATE STEAM LINE	DAMAGE END AT VALVE	COMPLETE
881	3	212	3/17/92	3' NORTH OF COL G16 15' ABOVE PIPE END AT BRACKETS MINOR EXPOSED INSULATION	PIPE ELBOW NEED REWRAP MINOR EXPOSED INSULATION	PROBLEM STILL EXISTS
881	3	144	3/17/92	3' AND 8' NORTH EAST OF COL II- 16 15' ABOVE	PIPE ELBOW NEED REWRAP MINOR EXPOSED INSULATION	COMPLETE
881	3	144	3/17/92	FLOOR TILES AND MASTIC AT NORTHERN OF HALL AT LIQUID NITROGEN DUMP	BROKEN FLOOR TILES AND MASTIC	COMPLETE
881	3	293	3/17/92	VULT AREA - NW CORNER AT REGULATOR STEAM 80	MULTIPLE EXPOSED DAMAGE AREA EXPOSED INSULATION	PROBLEM STILL EXISTS
881	2A		12	4" STEAM 15 AT 10' LEVEL ELBOW 16' WSW CO COL B-6		COMPLETE

ASBES, INVENTORY

881 2A	12	3/17/92	STEAM 15' ELBOW AT 10' LEVEL 15' W OF ROOM #11 DOOR	EXPOSED INSULATION	COMPLETE	
881 2A	12	3/17/92	16' ENE OF COL G-5 STEAM 80 LINE 7' LINES AT 8' LEVEL	3 DAMAGED AREAS ON STEAM LINE	COMPLETE	
881 2A	121	3/17/92	NORTHEAST CORNER OF ROOM (SOME VIBRATION)-AIRCELL	VACUUM PUM 4,5, & 6 COOLING WATER SUPPLY LINES	COMPLETE	
881 2A	122	3/17/92	STEAM 125 AT SOUTHWALL 6' WEST OF COL 119 2" LINE AT 10' LEVEL	EXPOSED INSULATION	COMPLETE	
881 2A	161	3/17/92	6' LEVEL 12' NE OF COL D-17 COOLING WATER RETURN LINE #4 RETURN LINE #4	JOINT INSULATION AT VALVE (LOOSE AND EXPOSED) OFF COOLING WATER	COMPLETE	
881 2A	161	3/17/92	8' EAST OF COL D-17 AT 3' LEVEL	VALVE INSULATION OFF PROCESS WATER LINE END ARE EXPOSED - LOOSE	COMPLETE	
881 2A	161	3/17/92	110' SOUTH OF ROOM 15 A STEAM 125 LINE RUNNING N -95	DAMAGE AT BRACKET	COMPLETE	
881 2A	12	3/17/92	5' SOUTHEAST OF COL J11 AT 10' LEVEL	PIPE END EXPOSED LOOSE INSULATION	COMPLETE	
881 2A	121	3/17/92	ENTIRE HALLWAY AND ADJACENT ROOMS	CEILING IS COMPOSED OF TROWLED ON FIREPROOFING, NEEDS TO BE ENCAPSULATED ON A REGULAR BASIS	ENCAPSOLATED 8/23/94 TLO#76536	
881 2A	154	4/1/92	6' NE OF ROOM 10A AND SW CORNER OF ROOM	2' TEAR IN DUCTWORK LOOKS LIKE MOSTLY FIBERGLASS AND CANVAS	COMPLETE	
881 2B	10	3/17/92	EXPOSED PIPE END ON 2" LINE STEAM 15 24' EAST SOUTH OF COL B-6 AT 10' LEVEL	EXPOSED INSULATION	COMPLETE	
881 2B	12	3/17/92				

ASBESTOS INVENTORY

				EXPOSED PIPE ENDS OFF PROCESS COLD WATER LINES 36' ESE OF COL B-6	EXPOSED INSULATION	COMPLETE
881 2B		12	3/17/92	15' SOUTH EAST PF CP, L11 AT 10'-12' LEVEL	PIPE ENDS EXPOSED, NEED ENCAPSULATE	COMPLETE
881 2B		121	3/17/92	ABOVE DOOR 122B TO TRANSFORMER VAULT ON CONDENSATE STEAM LINE 12'	EXPOSED INSULATION	COMPLETE
881 2B		155	3/17/92	6' NORTH EAST OF COL K7	CHIPPED AND EXPOSED INSULATION	COMPLETE
881 2B		155	3/17/93	STEAM 15 LINE (1) ENTRANCE NEAR ROOM 284	(1) COOLING WATER SUPPLY #4 EXPOSED END AT VALVE 7' LEVEL	COMPLETE
881 2B	266C	3/17/92		STEAM 15 LINE IN NE CORNER OF ROOM AT 8' LEVEL	DAMAGED ELBOW ON STEAM 15 LINE	COMPLETE
881 2B	266C	3/17/92		DOCK AREA AT DOOR 23 N WALL ARRAY	(1) EXPOSED INSULATION AT VALVE JOINTS (2) FROM STEAM BELOW BOX 031030 DAMAGED WITH SOME EXPOSED INSULATION	COMPLETE
881 2B		280	3/17/92	5' EAST OF COL K11 12' LEVEL	DAMAGED INSULATION AT BRACKET	COMPLETE
881 2B		121	3/17/92	VAULT AREA - SOUTH SIDE OF ROOM ON DOMESTIC COLD WATER LINE	DAMAGED ELBOW (TAPED) AND EXPOSED END	COMPLETE
				REVIEWED DATE		
				SIGN OFF		

881-7

Appendix 1A - Idle Equipment with Nonhazardous Materials Inventory

ID #	ROOM	DESCRIPTION OF EQUIPMENT	DATE ID	RAD	DESCRIPTION OF MATERIAL	HAZ MAT	QUANTITY	MANAGER	COMMENTS	SCHEDULED REMOVAL DATE		BASELINE MATERIAL REMOVED	
										NA	NA		
881-0001	NA	NA	NA	NA	NA	NA	NA	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0002	161	#0038554-00, HACKSAW 061-014	09/22/97	NO	OIL	NO	1 LITER	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0003	161	#00039107-00, BANDSAW 060-045	09/22/97	NO	COOLANT	NO	1 LITER	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0004	161	#00038777-00, MILL 020-066	09/22/97	NO	COOLANT	NO	1 LITER	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0005	161	#0019247-R0, LATHE 004-167	09/22/97	NO	COOLANT/OIL	NO	2 LITERS	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0006	115	#0003634-00, LATHE 004-161	09/22/97	NO	COOLANT/OIL	NO	2 LITERS	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0007	115	#00019365-00, LATHE 004-203	09/22/97	NO	Idle/Oil & Trunings	NO	2 LITERS	Gray	DISCONNECTED	DEFERRED	Declared Idle Date May 29, 1997	NA	
881-0008	115	#00039145-00, LATHE 004-264	09/22/97	NO	COOLANT/OIL	NO	2 LITERS	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0009	161	#00001902-R0, GRINDER 032-014	19692, 032-014	09/22/97	NO	COOLANT/OIL	NO	2 LITERS	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA
881-0010	115	#00038891-00, LATHE 004-245	09/22/97	NO	COOLANT/OIL	NO	2 LITERS	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0011	115	#00038776-00, LATHE 004-228	09/22/97	NO	COOLANT/OIL	NO	2 LITERS	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0012	115	#00039006-00, LATHE 004-256	09/22/97	NO	COOLANT/OIL	NO	2 LITERS	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0013	115	#00021646-00, LATHE 004-341	09/22/97	NO	COOLANT/OIL	NO	2 LITERS	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0014	115	#00038801-00, LATHE 004-236	09/22/97	NO	COOLANT/OIL	NO	2 LITERS	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0015	115	#00038850-00, RICKEL MILL, 021-057	09/22/97	NO	COOLANT/OIL	NO	2 LITERS	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0016	115	#00038747-00, TRACER UNIT 076-027	09/22/97	NO	Oil	NO	30 LITERS	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0017	115	#00038632-00, TRACER UNIT 076-002 #881-8591-5879, TRACER UNIT 076-010	09/22/97	NO	Oil	NO	30 LITERS	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0018	115	#00038757-00, TRACER UNIT	09/22/97	NO	Oil	NO	30 LITERS	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0019	115	#00038747-00, TRACER UNIT	09/22/97	NO	Oil	NO	30 LITERS	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0020	143C	#0003959-R0, LATHE 004-246	09/22/97	NO	COOLANT/OIL	NO	2 LITERS APPROX 20	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0021	122A	TRANSFORMER 370-036	09/22/97	NO	MINERAL OIL	NO	LITERS APPROX 20	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0022	122B	TRANSFORMER 370-037	09/22/97	NO	MINERAL OIL	NO	LITERS APPROX 20	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0023	122C	TRANSFORMER 370-038	09/22/97	NO	MINERAL OIL	NO	APPROX 20 LITERS	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0024	122B	SWITCH S-19	09/22/97	NO	MINERAL OIL	NO	APPROX 5 LITERS	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	
881-0025	284	RALSTON AIR COMPRESSOR	09/22/97	NO	MOTOR OIL	NO	4 LITERS	Gray	DISCONNECTED	DEFERRED	UNTIL D&D	NA	

Appendix 1 - Idle Equipment with Hazardous Materials Inventory

ID #	ROOM	DESCRIPTION OF EQUIPMENT	DATE ID	RAD	DESCRIPTION OF MATERIAL	HAZ MAT	QUANTITY	MANAGER	COMMENTS	HAZ CAT	OTHER PROG	WSRIC	LOTO	POSTING	INSPECT	SCHEDULED REMOVAL DATE	BASELINE DATE MATERIAL REMOVED
881-0026	114A	HYDROFLUORIDE ACID SCRUBBER	07/25/94	YES	HYDROFLUORIDE ACID	YES	DRY RESIDUE	Gray	DUE DILIGENCE FORM DEFERRED ON FILE	3	DECOMM	YES	NA	YES	NA	DEFERRED UNTIL DECOMMISSIONING	
881-0032	Rm 143	55 OIL DRUM WITH VACUUM 67-035	04/08/96	YES	OIL	YES	EMPTY	Gray		NA	NO	NA	NA	NA	NA	COMPLETE 06/12/96	
881-0033	Rm 121	55 OIL DRUM WITH VACUUM 00125475-00	04/08/96	YES	OIL	YES	EMPTY	Gray		NA	NO	NA	NA	NA	NA	COMPLETE 06/12/96	

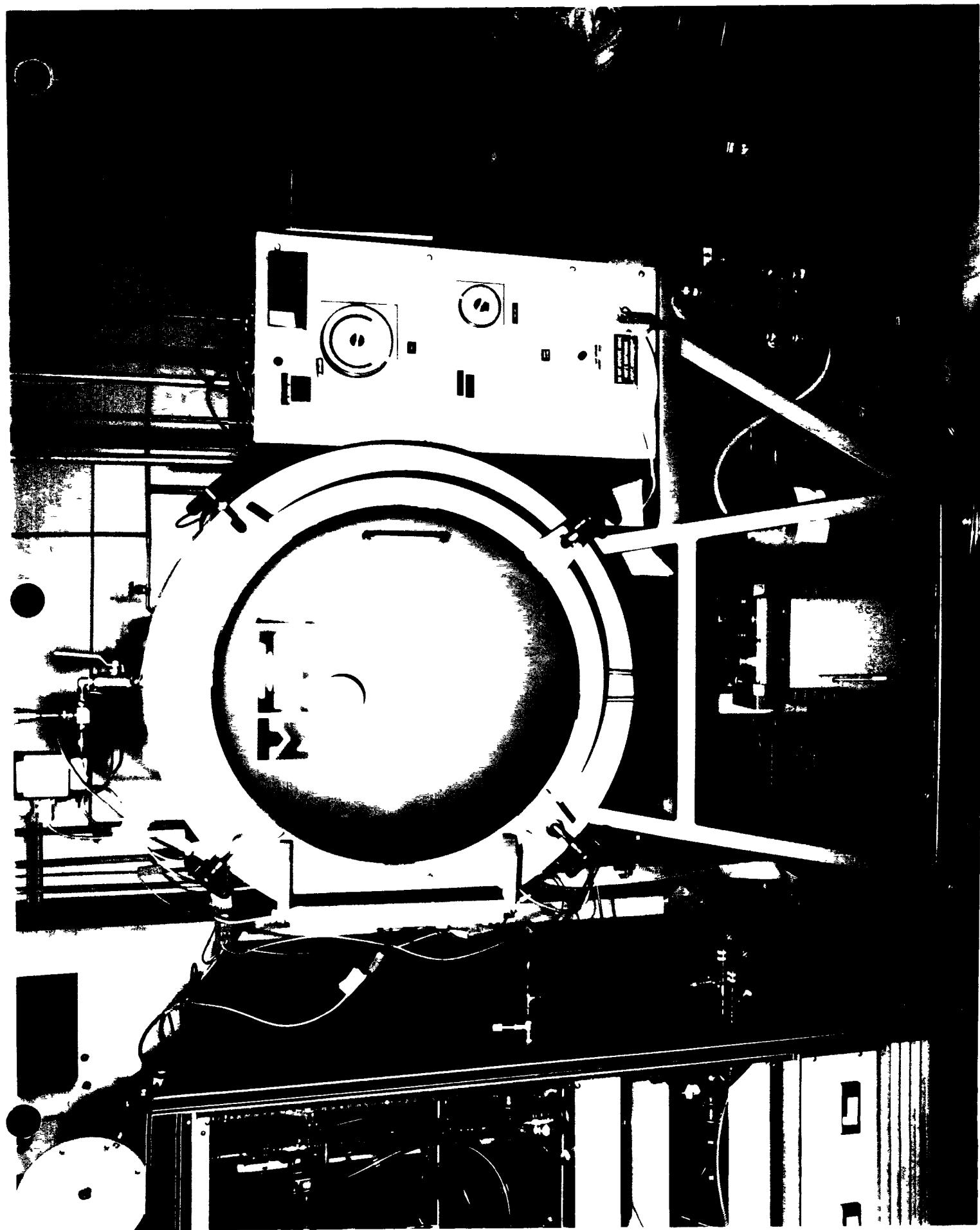
881-8

PHOTOGRAPH LOG FOR BUILDING 881 REVIEW PHOTOGRAPHS, MAY 1998

Photograph Number	Description
50591-07, Bldg 881, Room 233	Technology Development Equipment for Mercury Recovery
50591-08, Bldg 881, Room 264	Wastes, unidentified and unlabeled
50591-10, Bldg 881, Room 255	Miscellaneous lab equipment
50591-11, Bldg 881, Room 255	Drums of asbestos wastes that WEMS indicates are only LLW
50591-12, Bldg 881, Room 248	Groundwater infiltration into bucket and secondary containment pan Note staining on the walls and floor
50592-01, Bldg 881, Room 248A	PCB waste storage area
50592-02, Bldg 881, hall outside of Room 249	Leak down the wall
50592-03, Bldg 881, Room 249B	Miscellaneous equipment
50592-04, Bldg 881, hall outside of Room 247	Leak down the wall Asbestos ceiling tiles
50592-05, Bldg 881, Room 245	Miscellaneous equipment
50592-06, Bldg 881, Room 296	90-day RCRA Storage Unit 881-2429, showing uncharacterized liquid waste container with no secondary containment and bag of waste that was not labeled or sealed
50592-07, Bldg 881, Room 296	90-day RCRA Storage Unit 881-2429, showing waste containers
50592-08, Bldg 881, Room 296	90-day RCRA Storage Unit 881-2429, showing incompatible wastes containers stored on top of and next to each other without segregation
50592-09, Bldg 881, Room 296	90-day RCRA Storage Unit 881-2429, showing waste containers
50592-10, Bldg 881, Room 296	Excess/Waste Batteries
50592-11, Bldg 881, Room 296	Returned samples
50592-12, Bldg 881, Room 296	WEMS indicates that these three containers are full of waste, but the containers are empty and marked as such
50593-01, Bldg 881, Room 144 tunnel	Backlog waste drums that need repacked
50593-02, Bldg 881, Room 144 tunnel	Roof of the tunnel shows evidence of leaking

PHOTOGRAPH LOG FOR BUILDING 881 REVIEW PHOTOGRAPHS, MAY 1998

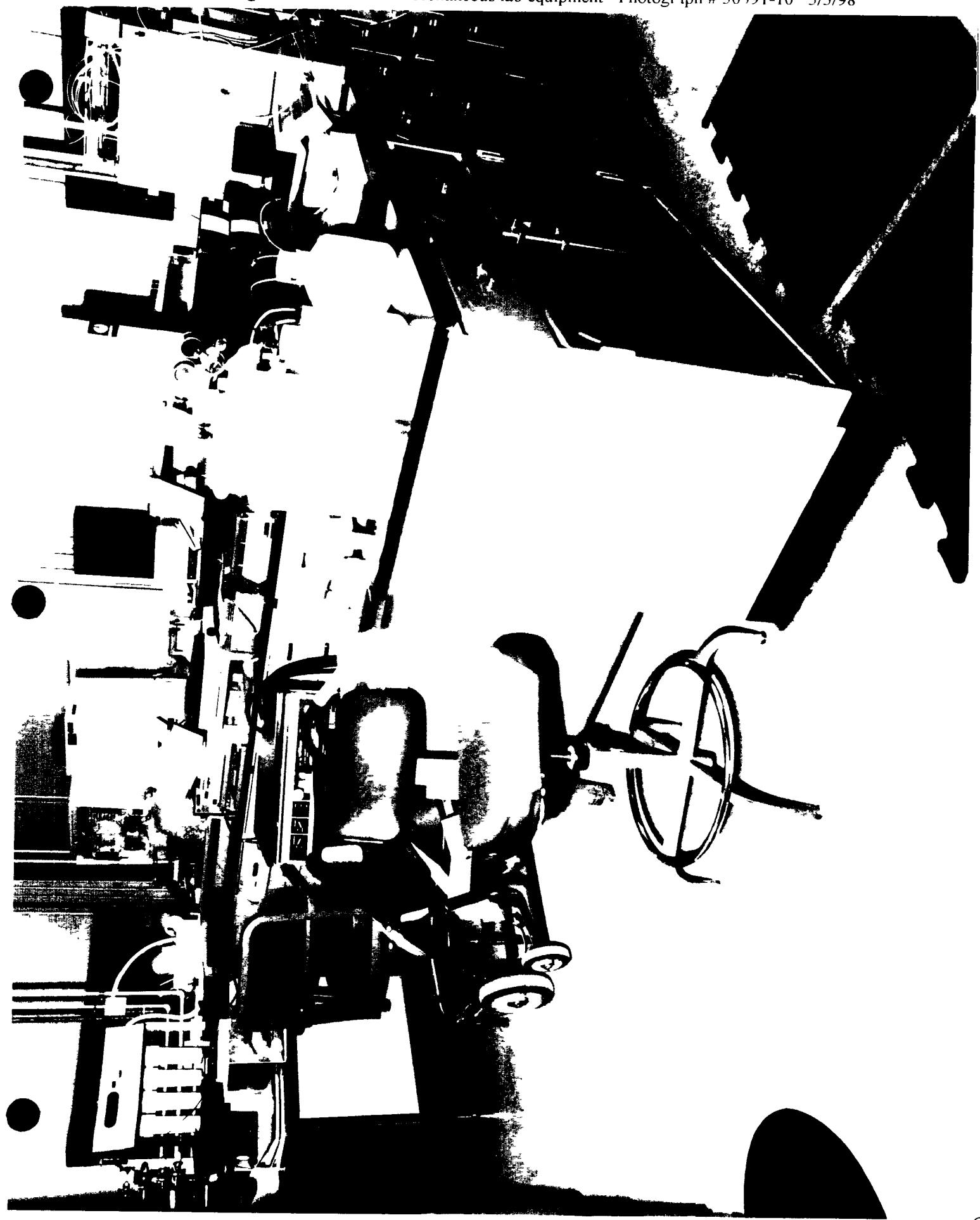
Photograph Number	Description
50593-03, Bldg 881, Room 161	Miscellaneous equipment and pump system showing past leakage
50593-04, Bldg 881, Room 161	Miscellaneous equipment and combustibles
50593-05, Bldg 881, Room 161	Miscellaneous equipment and combustibles
50593-06, Bldg 881, Room 143C	Miscellaneous equipment and combustibles
50593-07, Bldg 881, Room 143F	Miscellaneous equipment and combustibles
50593-08, Bldg 881, Room 199	Records storage - combustibles
50593-09, Bldg 881, Room 121	Radioactive waste box and drum collecting liquid behind the box, no label on the drum
50593-10, Bldg 881, Room 122	Old transformer, retrofitted with mineral oil
50593-11, Bldg 881, Room 121	LLW drums
50593-12, Bldg 881, Room 121	Equipment with liquid collecting in tray and evidence of past leakage onto the floor
50594-01, Bldg 887	Tank room
50594-03, Bldg 881, Room 286	Groundwater infiltration into sump
50594-04, Bldg 881, Room 287	Location of RCRA Treatment Unit 881 3B Drums in the treatment unit
50594-05, Bldg 881, Room 267	Location of RCRA Treatment Unit 881 3B Drums being filled with waste that are not identified in VEMS
50594-06, Bldg 881, Room 267	Location of RCRA Treatment Unit 881 3B Drums being filled with waste that are not identified in VEMS
50594-07, Bldg 881, Room 282	One of several pieces of equipment which still contain waste liquids
50594-09, Bldg 881, Room 309H	Elevator with evidence of oil leakage PCB contamination unknown
50594-10, Bldg 881, Room 309G	"Pumped Process Waste" lines which have leaked in the past



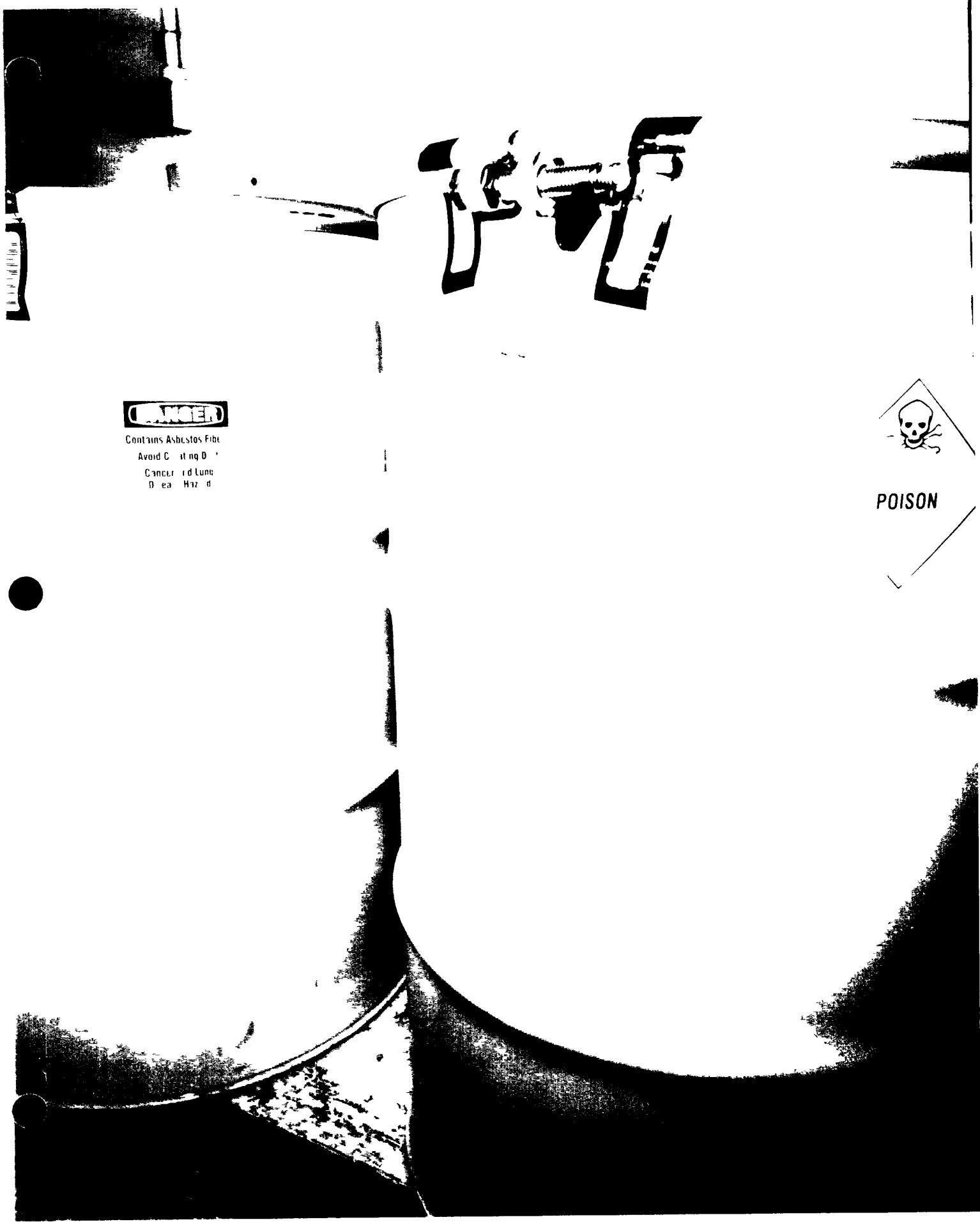
Bldg 881 Room 264 Wastes unidentified and unlabeled Photograph #50591 08 5/5/98



Bldg. 881 Room 265 Miscellaneous lab equipment Photograph # 50591-10 5/5/98



Bldg 881 Room 257 Drums of asbestos wastes that WEMS indicates are only LLW Photograph #50591 11
7/5/98



Contains Asbestos Fiber

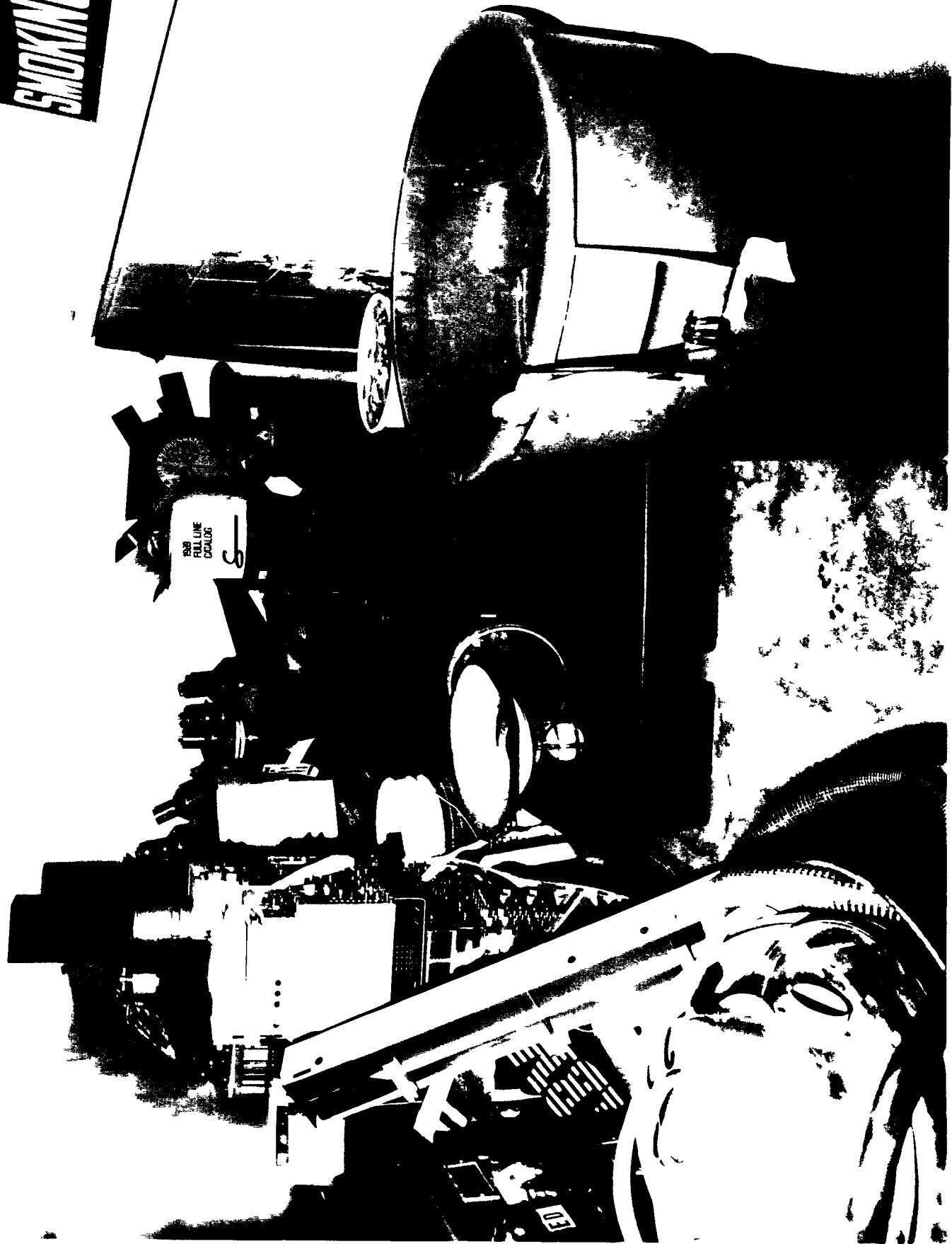
Avoid Coughing
Cancer of Lung
Dust Hazard



POISON

50591

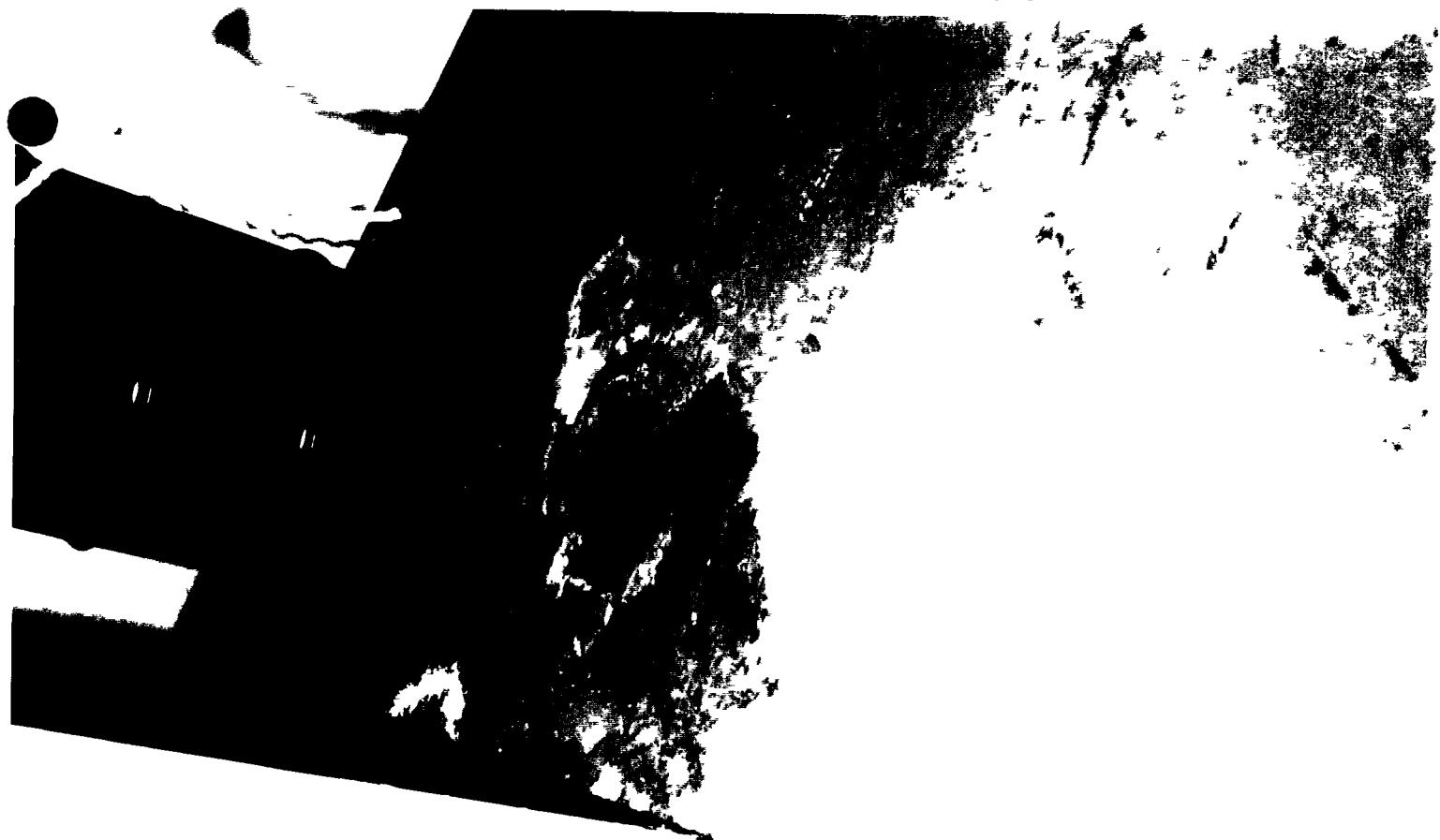
Bldg. 881 Room 248 Groundwater infiltration into bucket and secondary containment pan. Note staining on walls and floor. Photograph #50591 12-5/98





FMPT

Bldg. 881 hall outside of Room 249 Leak down the wall Photograph #50592 02 5/5/98

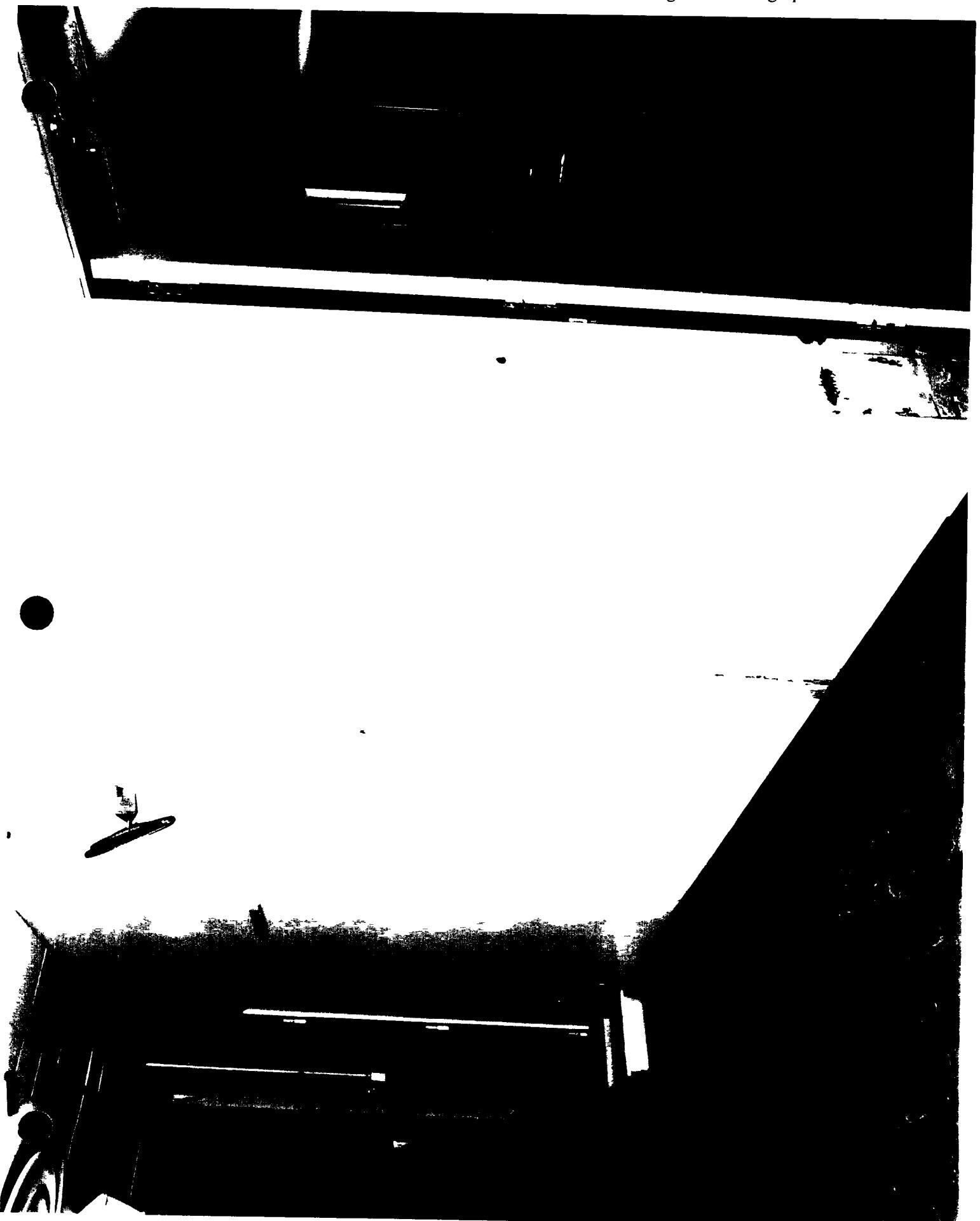


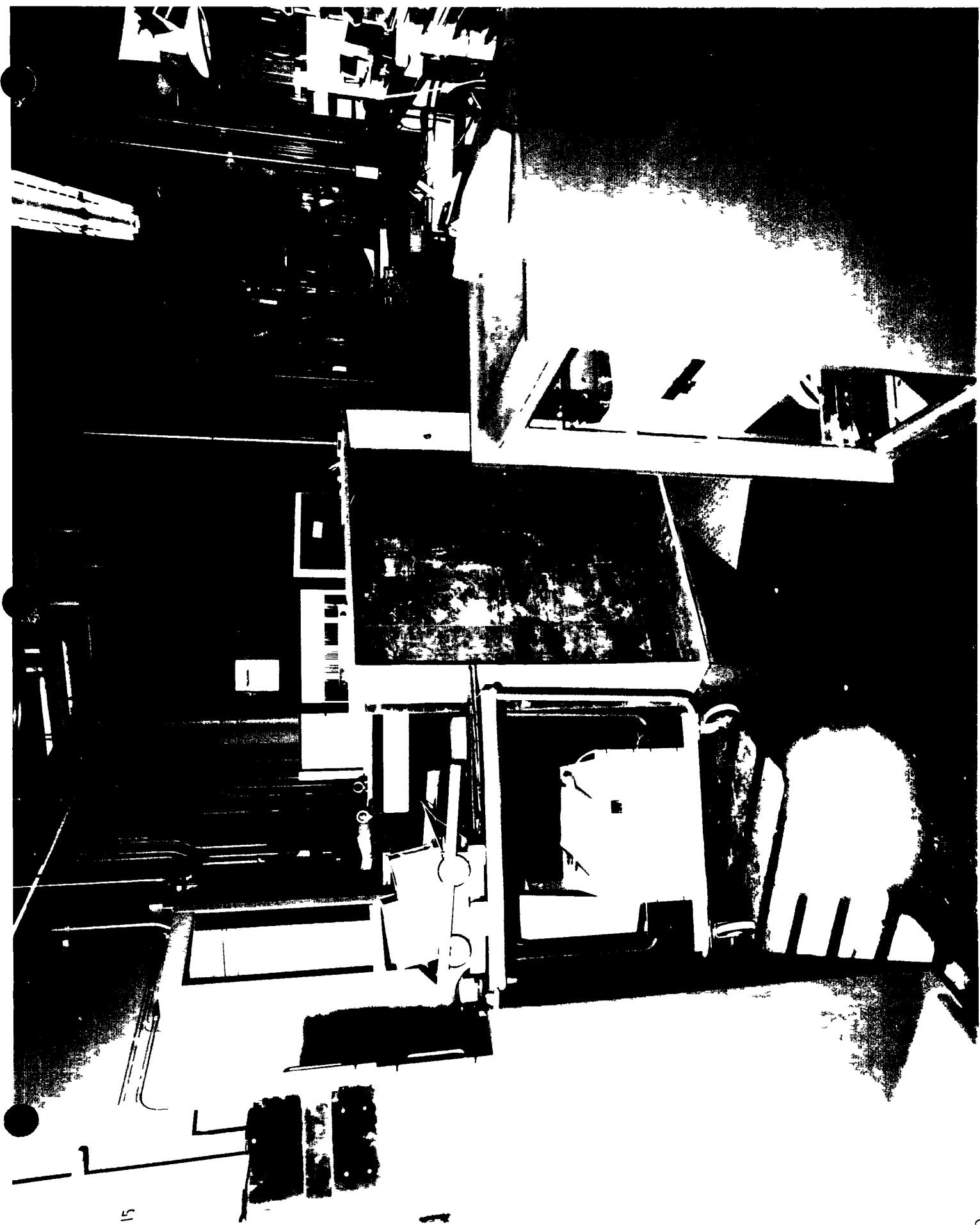
Bldg 881 Room 249B Miscellaneous equipment Photograph #50592 03 5/5/98



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Bldg 881 hall outside of Room 247 Leak down the wall Asbestos ceiling tiles Photograph #50592-04 5/5/98

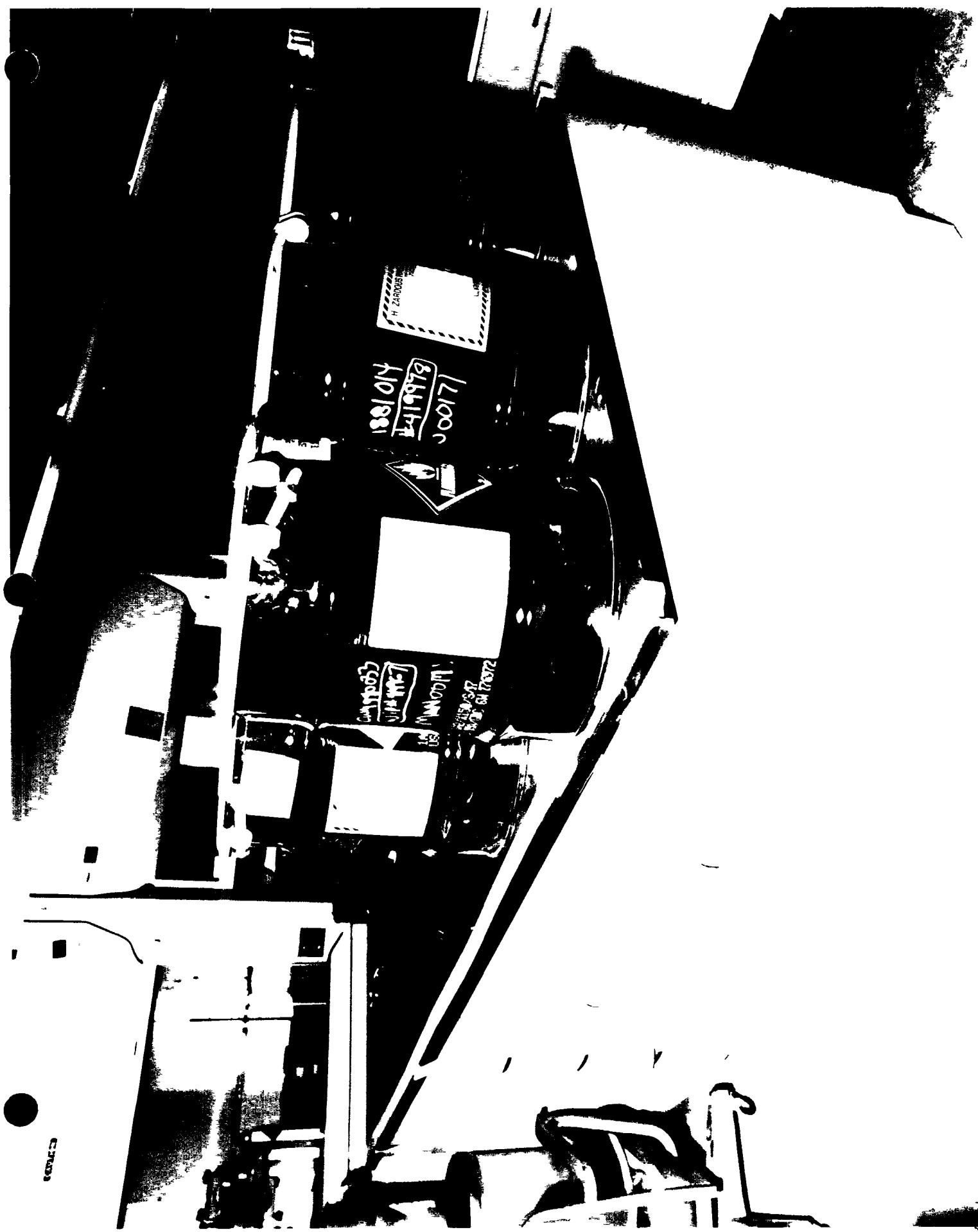




Bldg 881 Room 296 90 drv RCRA Storage Unit 881 2429 showing uncharacterized liquid waste
container with no secondary containment and bag of waste that was not labeled or sealed Photograph
#50592 06 5/5/98



Bldg 881 Room 296 90 d/w RCR A Storage Unit 881 2429 showing waste containers Photograph
#60692 07 5/5/98



Bldg 881 Room 296 90 div RCRA Storage Unit 881 2429 showing incompatible wastes containers stored on top of and next to each other without segregation Photograph #50592 08 5/5/98



Bldg 881 Room 296 90-dw RCRA Storage Unit 881 2429 showing waste containers Photograph
#50192 09 5/98

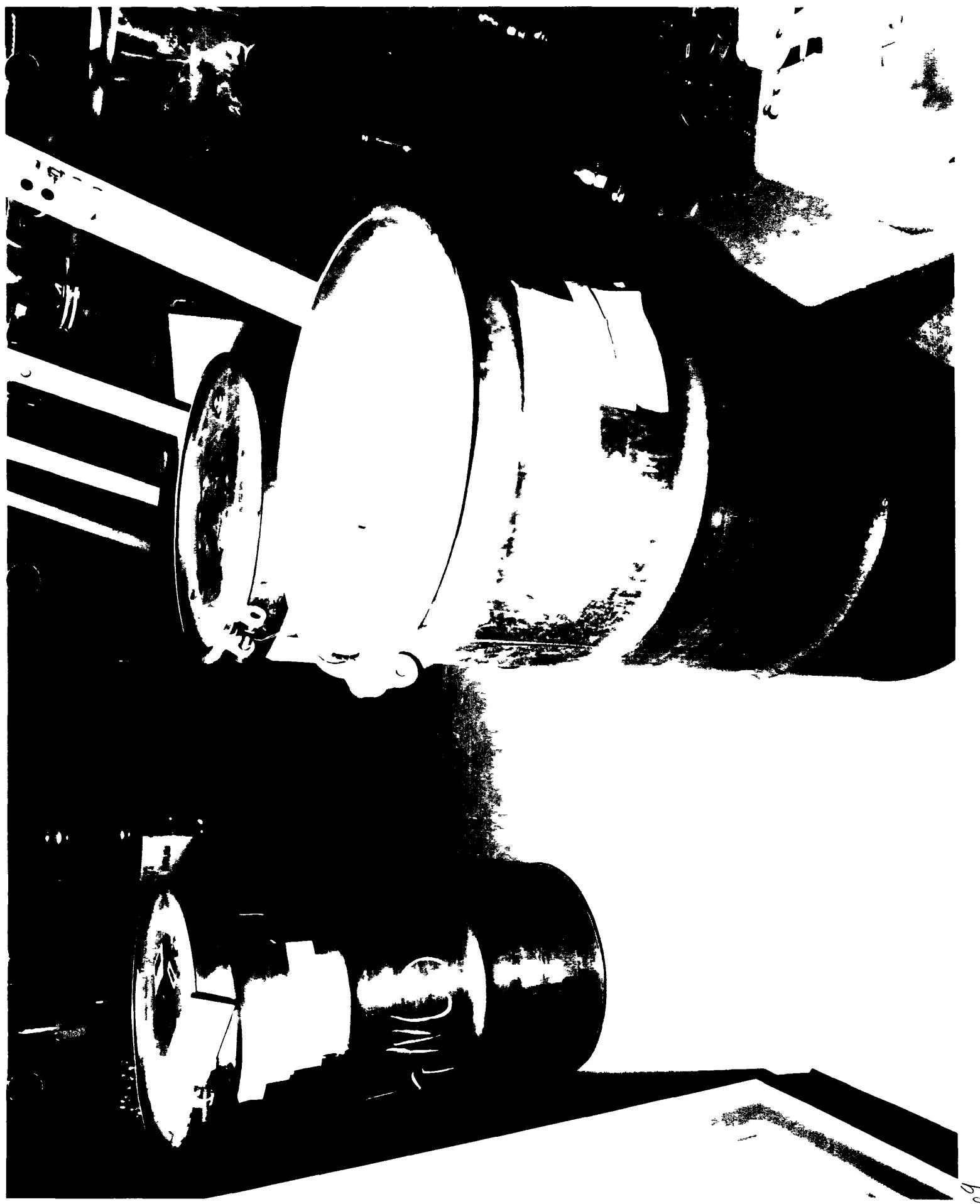




Bldg 881 Room 296 Returned samples Photograph #80892 11 5/5/98



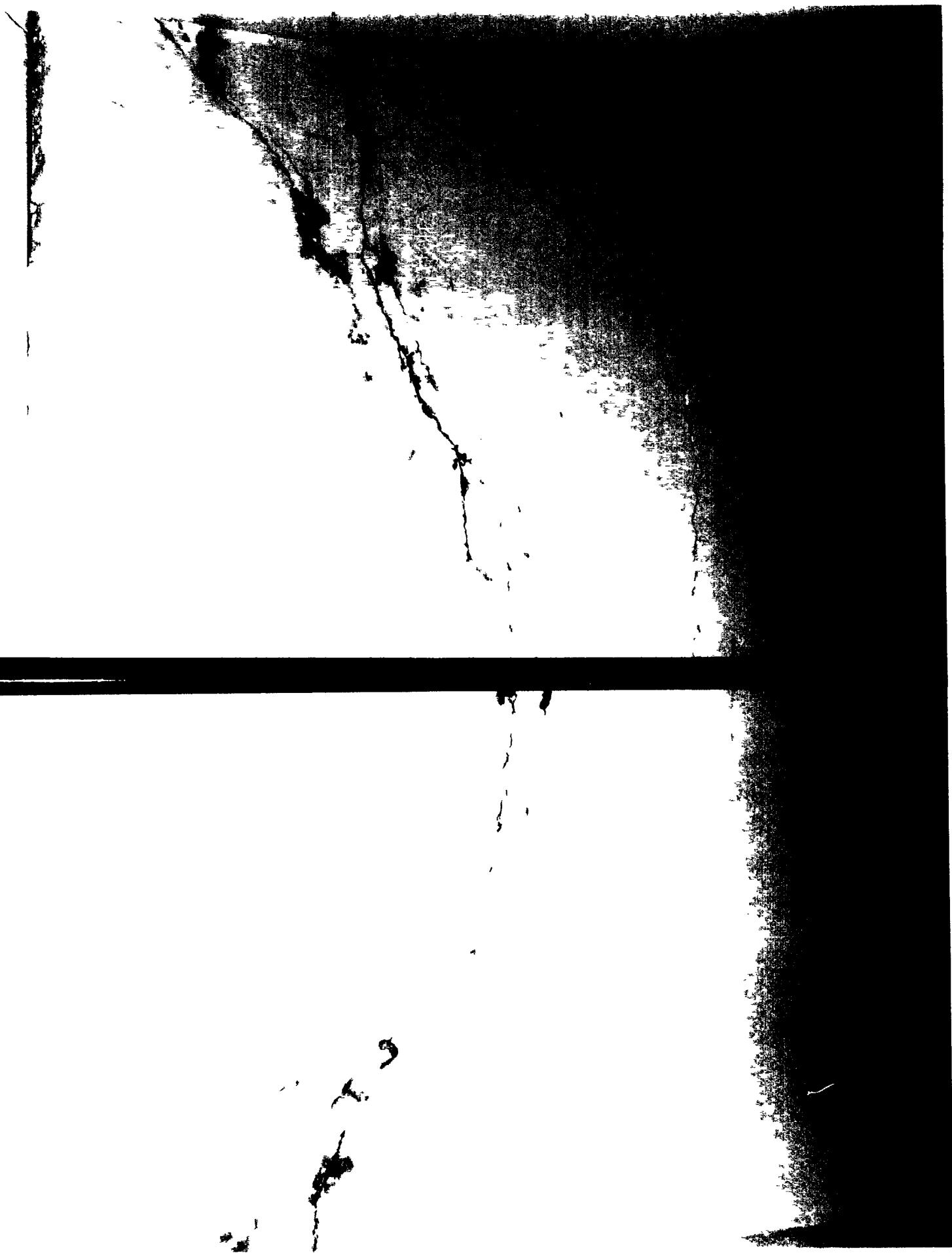
Bldg 881 Room 296 WEMS indicates that these three containers are full of waste but the containers are empty and marked as such Photograph #50592 12-5-98



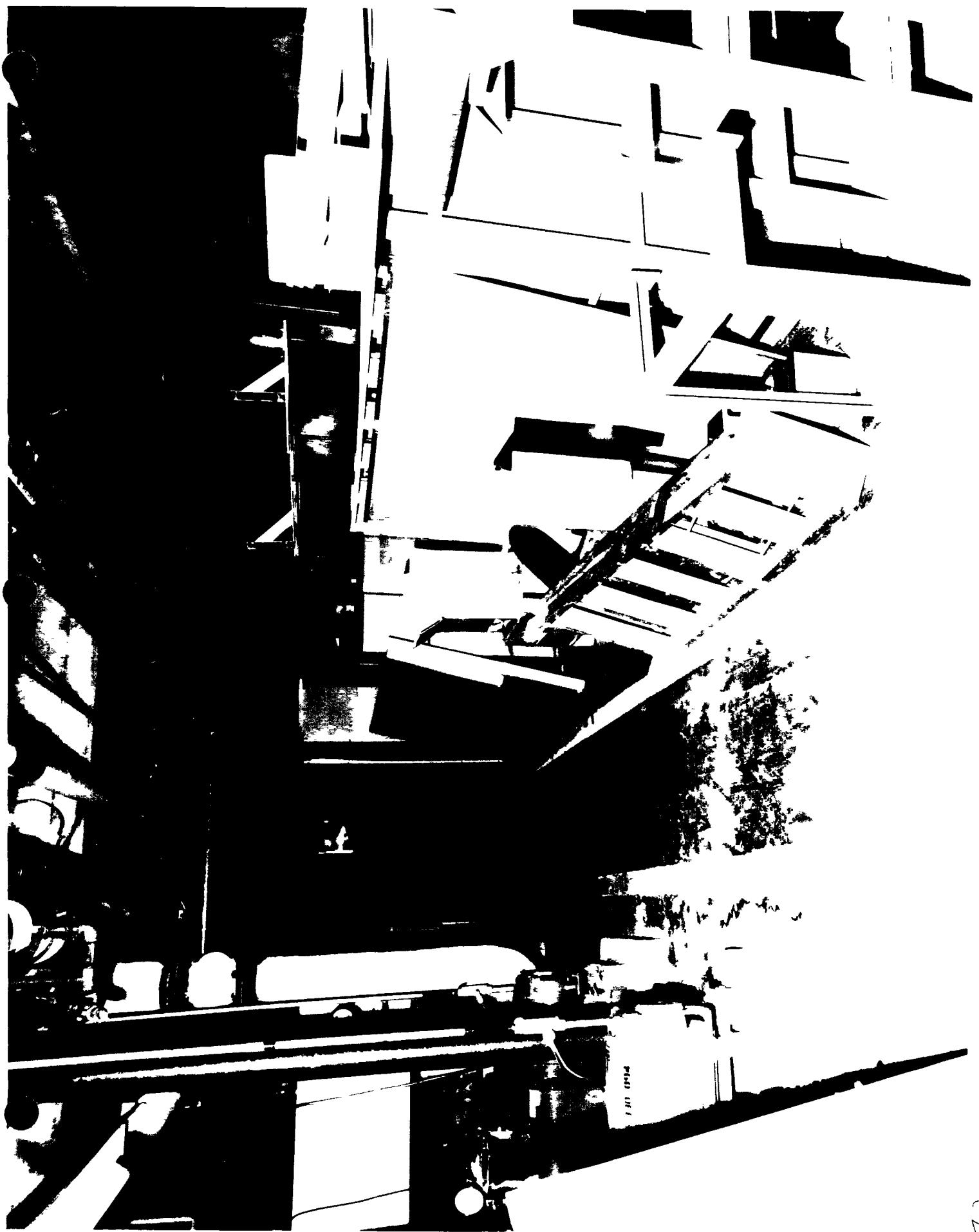
Bldg. 881 Tunnel - Backlog waste drums that need repacked - Photograph #50593 01 5/5/98



Bldg 881 Room 144 tunnel Roof of the tunnel shows evidence of leaking Photograph #50593 02
7/5/98



Bldg. 881 Room 161 Miscellaneous equipment and pump system showing past leakage Photograph
#20893 03 5/5/98





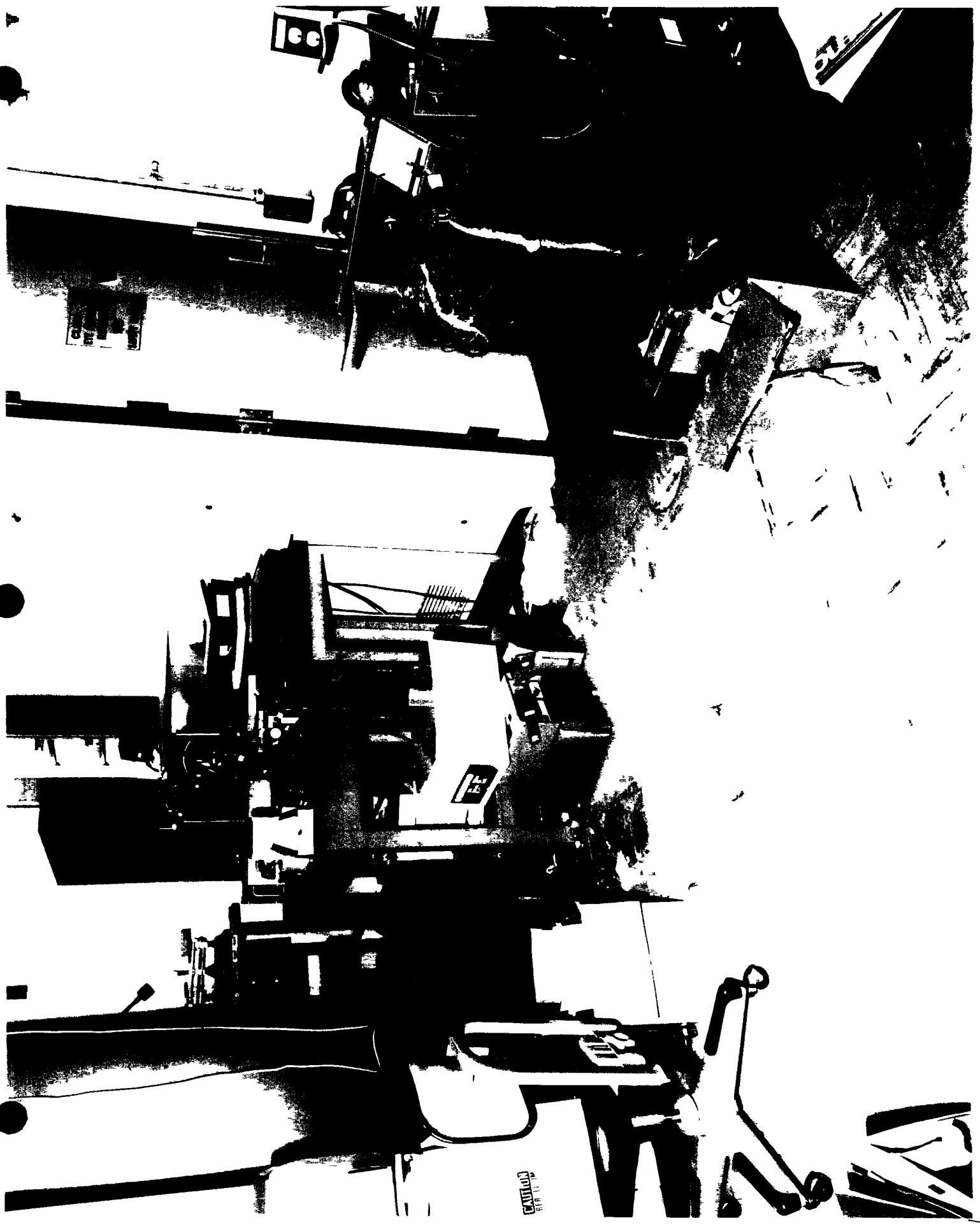
Bldg. 881 Room 161 Miscellaneous equipment and combustibles Photograph #50593 05 5/5/98





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Bldg. 881 Room 14-T Miscellaneous equipment and combustibles Photograph #60693 07 5/6/98



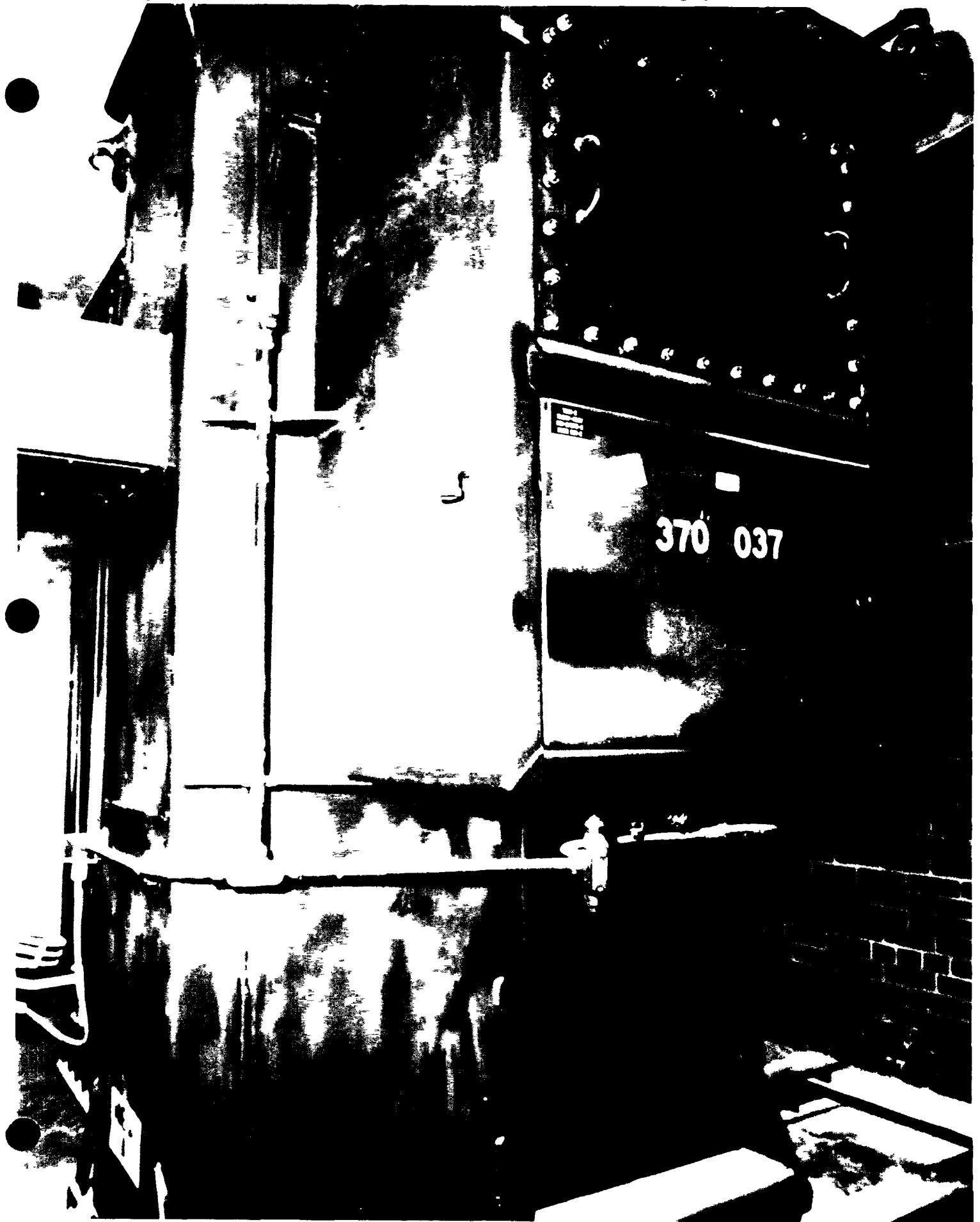
Bldg 881 Room 199 Records storage combustibles Photograph #50593 08 5/5/98



Bldg 881 Room 121 Radioactive waste box and drum collecting liquid behind the box no label on the
drum Photograph #60693 09 6/6/98

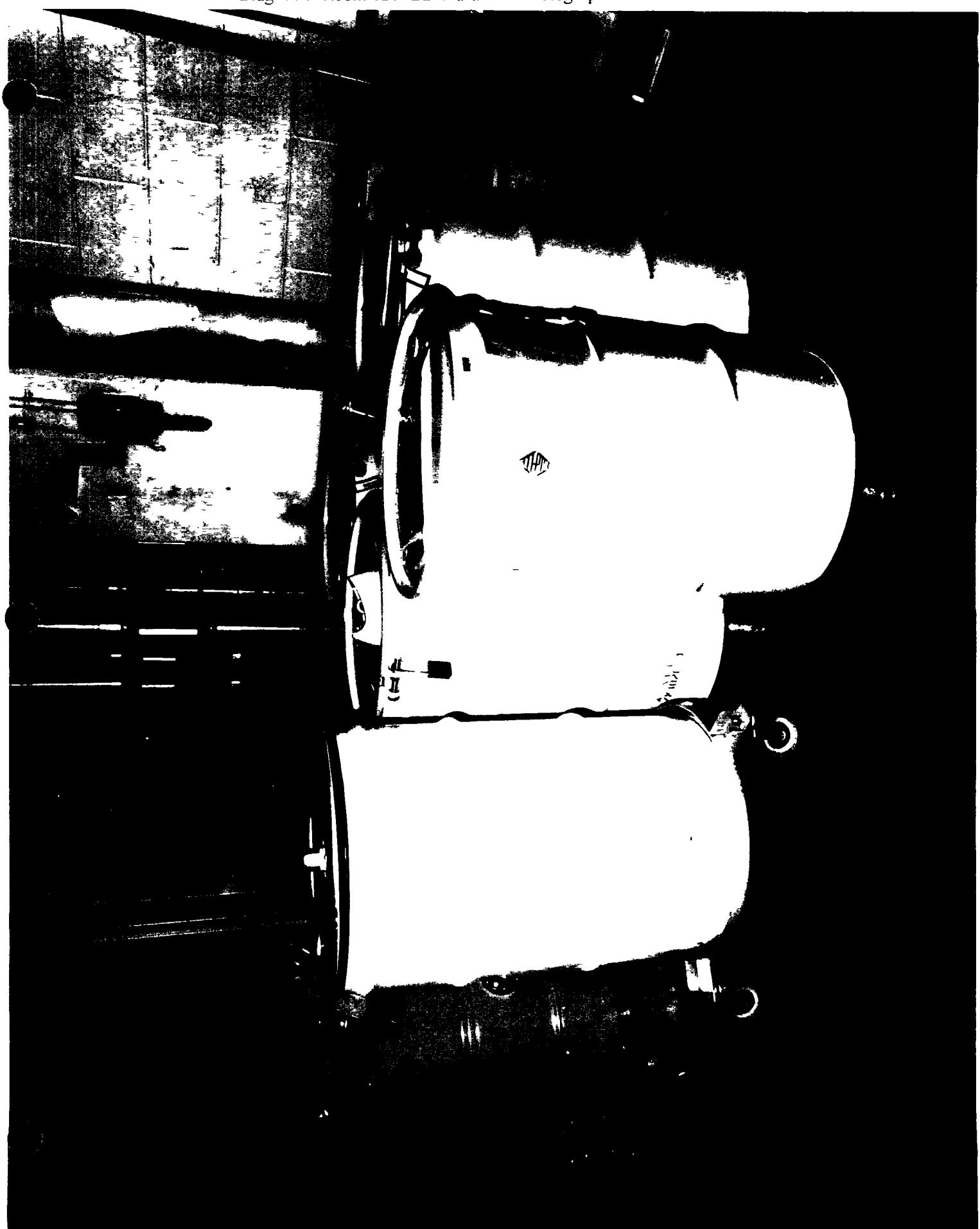


Bldg 881 Room 122 Old transformer retrofitted with mineral oil Photograph #50593 10 5/5/98



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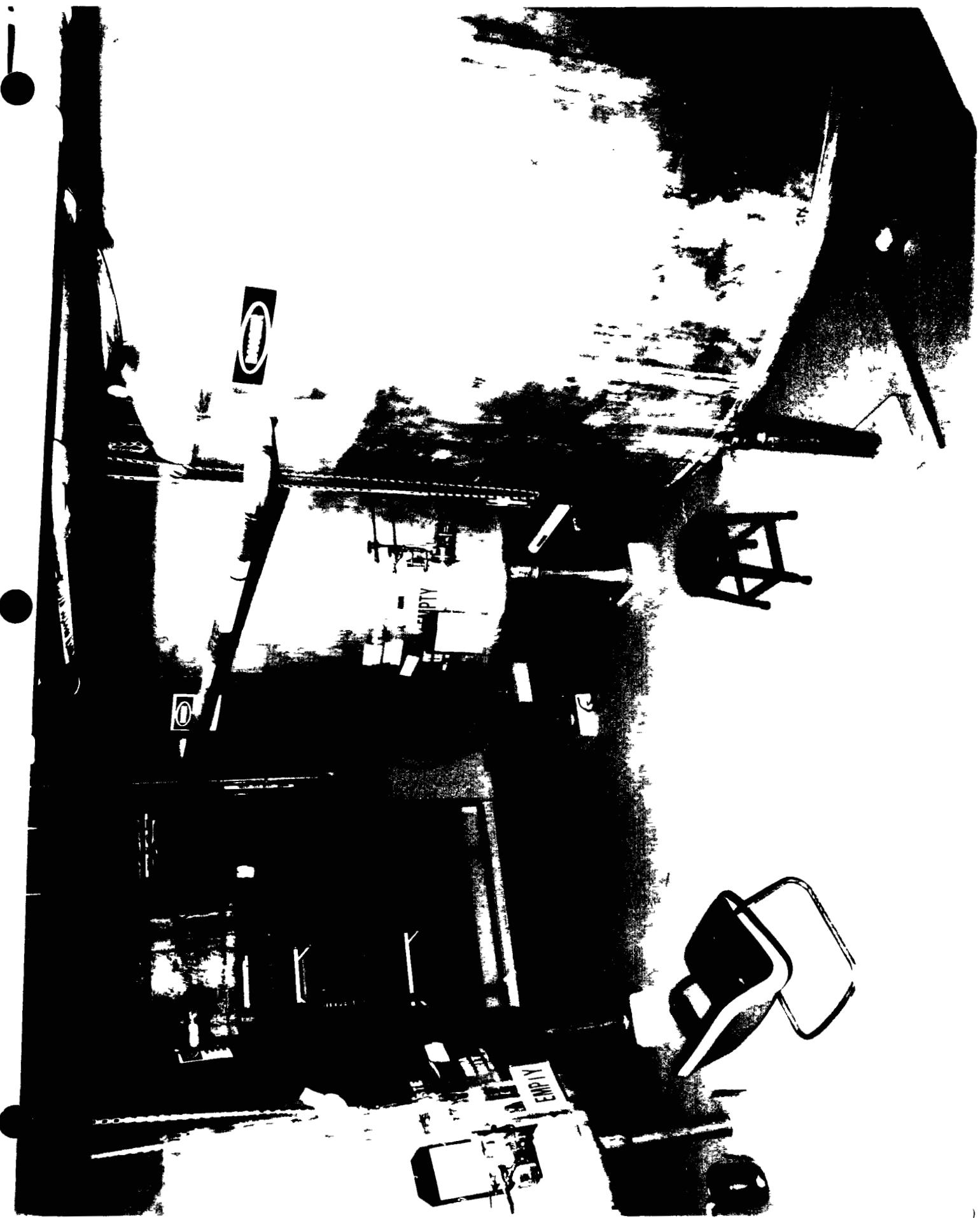
Bldg 881 Room 121 LLW drums Photograph #50592 11 5/5/98



Bldg 881 Room 121 Equipment with liquid collecting in tray and evidence of past leakage onto the floor
Photograph #50593 12 5/5/98



Bldg 887 Tank room Photograph #5094 01 5/5/98



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Bldg. 881 Room 286 Groundwater infiltration into sump Photograph #50594 03 5/5/98

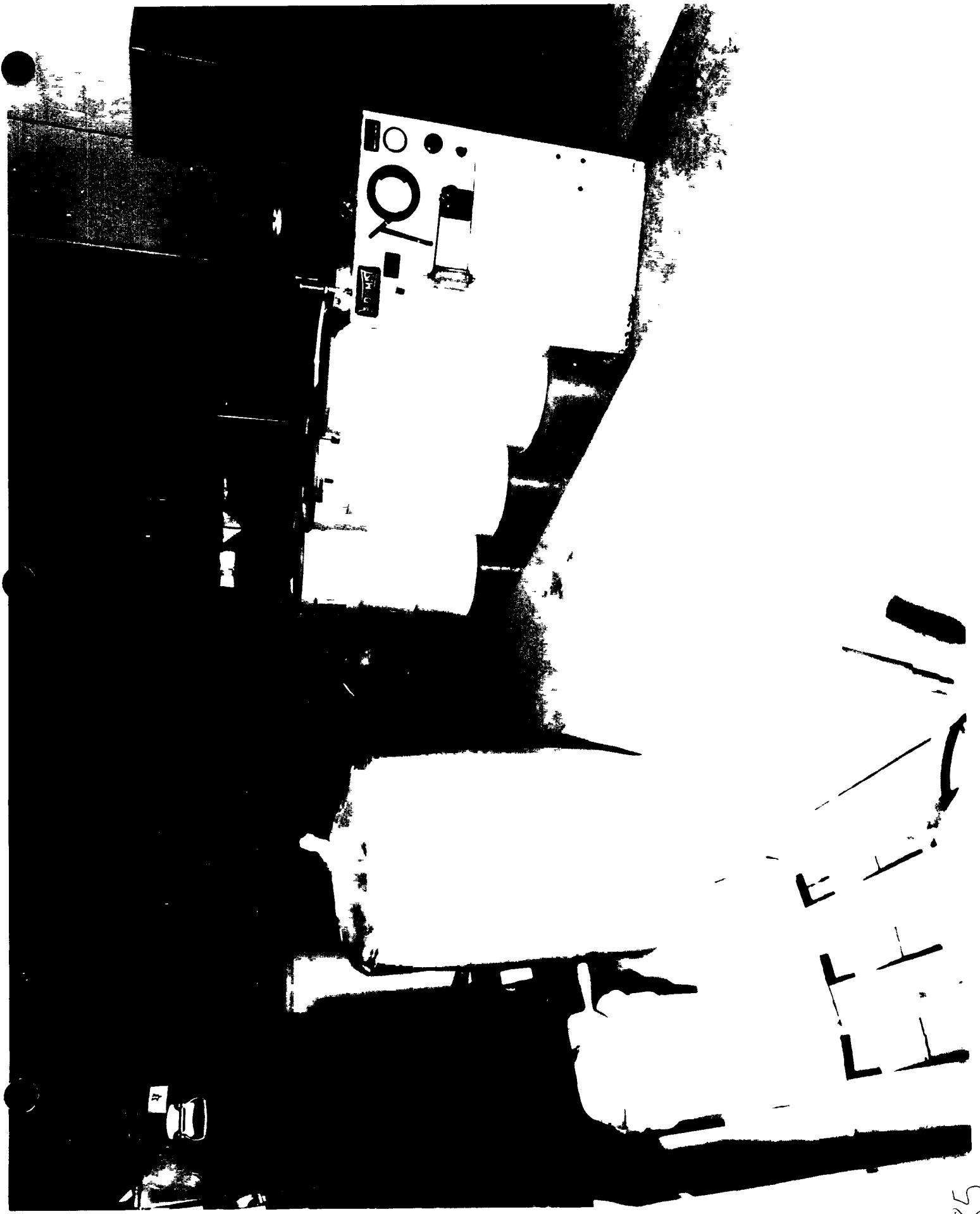


883

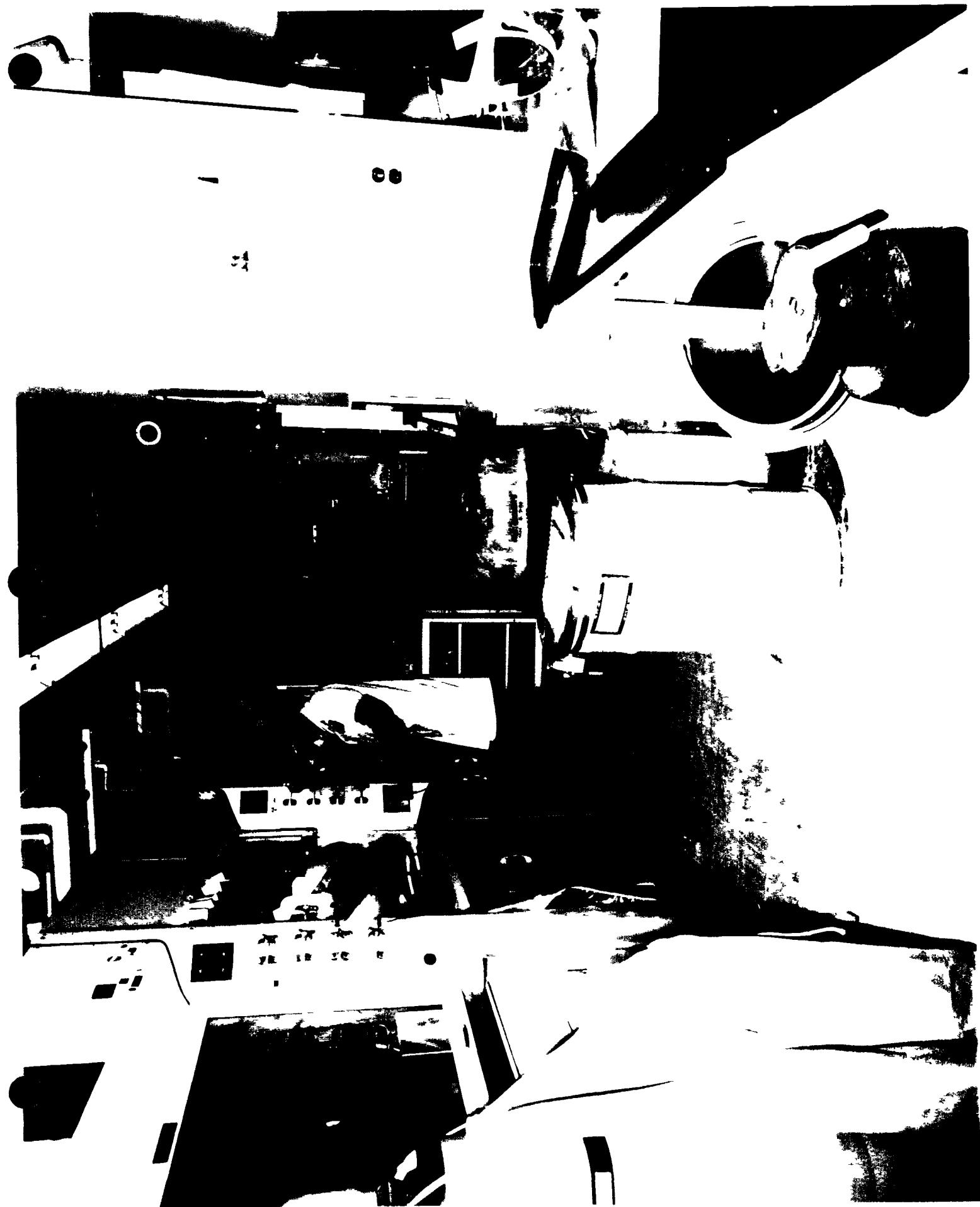
Bldg. 881 Room 267 Location of RCRA Treatment Unit 881 3B Drums in the treatment unit
Photograph #80594 04 5/5/98



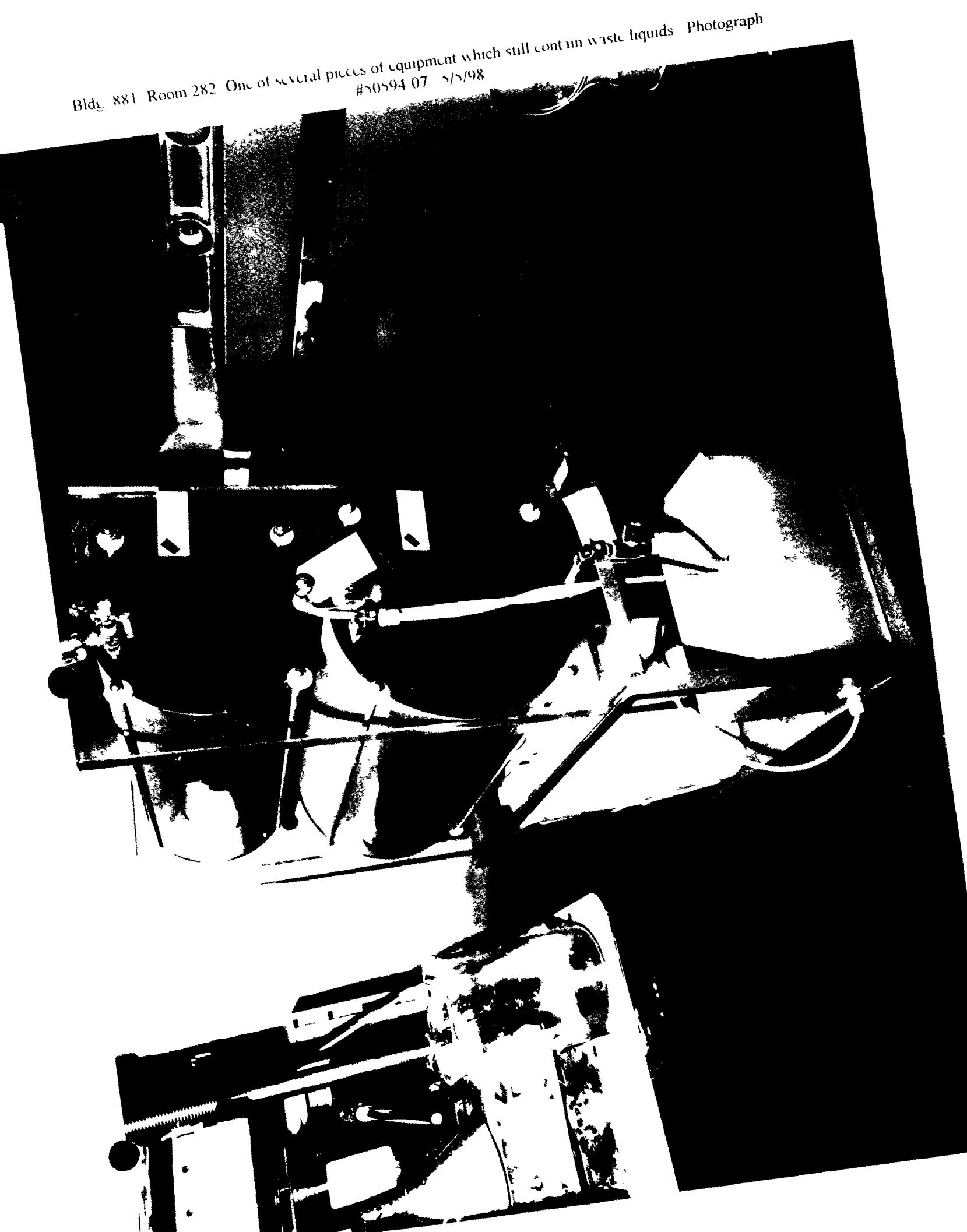
Bldg 881 Room 267 Location of RCRA Treatment Unit 881 3B Drums being filled with waste that are
not identified in WEMS Photograph #50594 05 5/5/98



Bldg. SSE Room 267 - Location of RCRA Treatment Unit 8813 - Drum containing ELM waste that is
not in WEMS - Photograph #50594 06 8/5/98



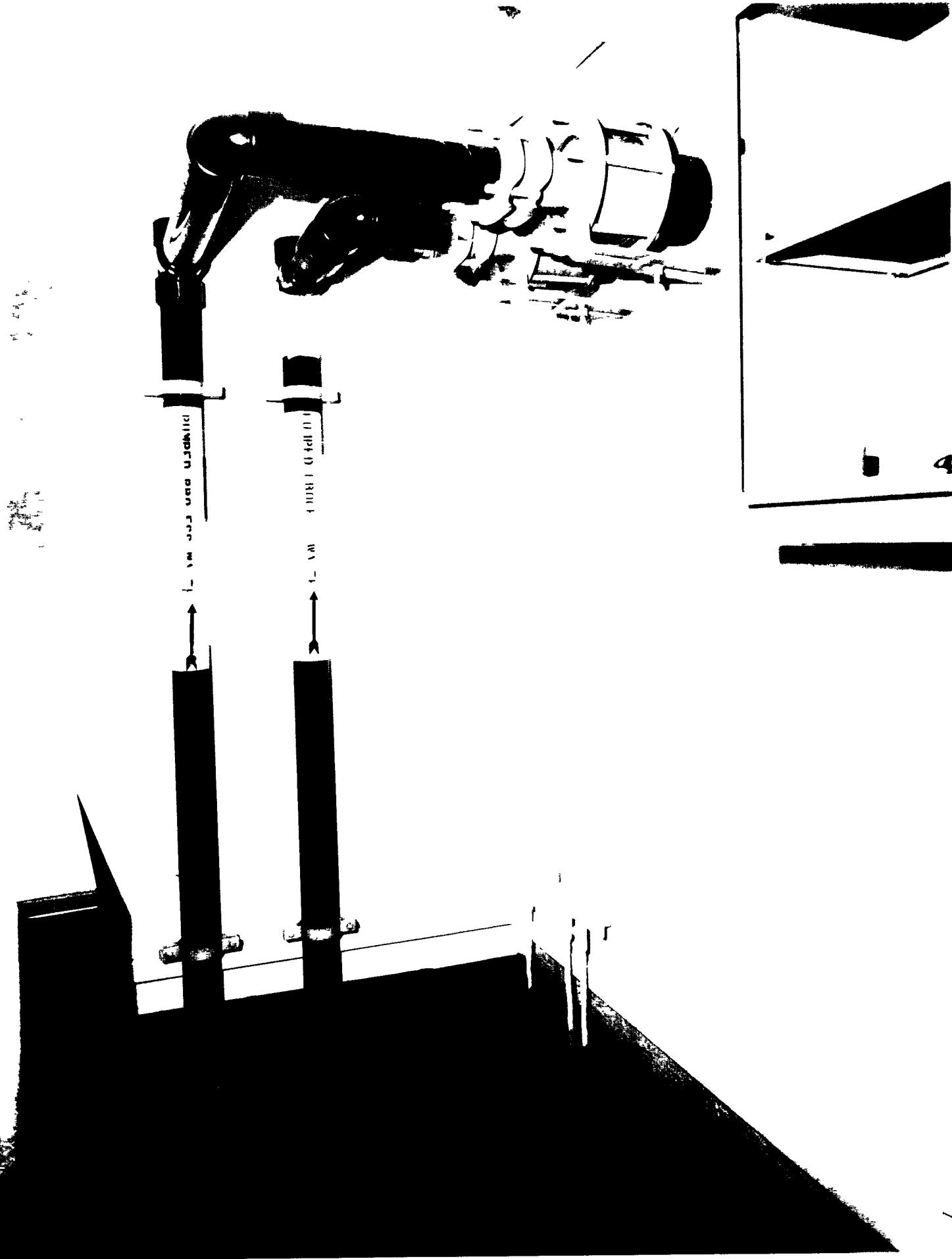
Bldg 881 Room 282 One of several pieces of equipment which still contain waste liquids Photograph
#70594 07 7/7/98



Bldg. 881 Room 309H Elevator with evidence of oil leakage PCB contamination unknown Photograph
#60694 09 5/5/98



Bldg 881 Room 309G Pumped Process Waste lines which have leaked in the past Photograph
#50594 10 5/5/98



89/89